

## Whistleblowing Policy:

### Sign and Date

Date Created	Date Reviewed	Next Review Due
2021	23.06.21	June 2022

## Whistleblowing Policy

This policy outlines what you should do if you suspect something happening at work is putting you or others in danger, or is illegal or unethical.

### 1. What is whistleblowing?

Our aim is to maintain the highest standards of integrity in everything we do. However, all organisations can occasionally be affected by conduct that is dangerous, against the law or breaches ethical or professional codes. Should you have any such concerns, we encourage you to report them immediately — this is called ‘whistleblowing’. You can be assured that we will take your concerns seriously, they will be thoroughly investigated, and you can be confident there will be no reprisals.

The types of concerns you may want to raise with us by whistleblowing might include:

- a) Any activity you suspect is criminal
- b) Any activity you suspect puts health and safety at risk
- c) Any activity you suspect may damage the environment
- d) Any activity you suspect breaches our policy on bribery and corruption
- e) Any failure to comply with legal or regulatory obligations
- f) Any failure to meet professional requirements
- g) Any attempt to conceal one or more of these activities.

Speak to your Manager if you are not sure whether something you have become aware of is covered by this policy. Note that if your complaint is about the way people are behaving towards you, then you should refer to our policy on Bullying and Harassment, or to our Grievance Policy, for guidance on how to proceed.



## **2. How to raise a whistleblowing concern**

In most cases, you should start by raising your concerns with your Manager, either face-to-face or in writing.

If you would prefer not to go to your Manager, you should write to the trustees of the charity. You should also do this if your concerns are of a very serious nature.

Your letter should say that you are raising your concerns under this policy and then explain what they are. Include all the key facts, dates, and the names of the people involved.

You will be invited to a meeting to discuss your concerns, and you are entitled to be accompanied at this and any subsequent meetings by a colleague or trade union representative. If you bring a companion, we ask that you both agree to keep your disclosures confidential before and after the meeting and during any investigation that may follow.

After the initial meeting, we will investigate your concerns and we may ask you to attend further meetings. To investigate properly, we may involve specialists with particular knowledge or experience of the issues you have raised.

You will be kept informed about how our investigations are progressing and how long they are likely to take.

Sometimes, however, we may be unable to give you details about the investigation (or any action it leads to) as we need to protect confidentiality and comply with legal obligations.

Your concerns will be addressed fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not satisfied with how we have conducted the investigations, you can take the matter to the board of trustees for further consideration.

Most concerns are raised with us in good faith, but occasionally someone makes a false allegation out of malice or because they believe they have something to gain. Anyone found doing this will face action under our Disciplinary Policy.

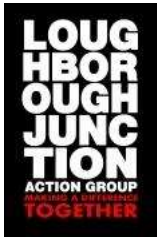
## **3. Confidentiality and anonymity**

There is a significant difference between wanting to keep your concerns confidential and making a disclosure anonymously. We discourage anonymous whistleblowing.

You are always encouraged to raise concerns openly, and if you prefer to do so in confidence, we will do all that we can to ensure your identity remains hidden. We may want to disclose your identity to people involved in the investigation, but will always discuss this with you first.

You are protected from reprisals under this policy, but if you are still worried, we encourage you to discuss this with the trustees and we will explore how far we can go in keeping your concerns confidential.

Concerns raised anonymously are very difficult — and sometimes impossible — to investigate. We can't properly establish whether your allegations are credible without being able to ask you for more



details or for clarification, and this makes it hard to reach an informed decision. This is why we urge you not to report matters anonymously.

#### **4. How we protect whistle-blowers.**

If you raise a concern in good faith under this policy, we will support you fully even if we find through our investigations that you made a mistake or that there has been no breach of policy, legal obligation etc.

All whistle-blowers are afforded the same protection, so you must not threaten or retaliate against others who have raised concerns or carry out reprisals against them. If you are involved in such conduct you may face disciplinary action. You may also face legal action from the whistle-blowers who could have the right to sue you personally for compensation in the employment tribunal in these circumstances.

You can seek further advice on whistleblowing, protecting confidentiality, and being protected from reprisals from the independent charity Public Concern at Work, which offers a confidential helpline on 020 7404 6609; [www.pcaw.org.uk](http://www.pcaw.org.uk), email- [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk).

#### **5. Taking your concerns outside the Company**

In most cases you should not find it necessary – or, from our point of view, desirable – for anyone outside the charity to become involved when a whistleblowing allegation is made.

In some exceptional circumstances, you may need to go to an external body – an industry regulator, for example – and the independent charity Public Concern at Work operates a confidential helpline and can direct you towards the appropriate regulator for the type of issue you want to raise. We strongly encourage you to seek advice from a manager or the trustees before reporting a concern to anyone external.

This policy covers the actions of third parties such as suppliers, service providers, and clients, as well as our staff. Should you have concerns about a third party, you are encouraged to raise them with us before approaching anyone else. Your Manager will be able to explain how you should proceed.

Alerting the media to a concern – particularly before or during an internal investigation – is almost never justified or appropriate in any situation. We strongly discourage you from doing so, and will treat any contact with the press under our Disciplinary Policy. We would normally expect you to have taken all reasonable steps to deal with the matter internally or with an external regulator, and to have taken full advice from a lawyer or Public Concern At Work before being justified in approaching the press.