10.5 WHISTLEBLOWING POLICY

About this policy

10.5.1 We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

10.5.2 This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.

What is whistleblowing?

10.5.3 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

Qualifying Disclosures

10.5.4 Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that you genuinely and reasonably believe is in the public interest and shows that the Organisation has committed a "relevant failure" by:

- Committing a criminal offence
- Failing to comply with a legal obligation
- A miscarriage of justice
- Endangering the health and safety of an individual
- Environmental damage
- Sexual harassment (unwanted conduct of a sexual nature, as defined in the Equality Act 2010)
- Concealing any information relating to the above.

These acts can be in the past, present or future e.g. a disclosure qualifies if it relates to environmental damage that has happened or is likely to happen. The disclosure has to be "in the public interest".

How to raise a concern

10.5.4 We hope that in many cases you will be able to raise any concerns with your manager. However, where you prefer not to raise it with your manager for any reason, you should contact the HR team.

10.5.5 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Confidentiality

10.5.6 We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

External disclosures

10.5.7 This policy aims to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

10.5.8 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice from the HR team before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

10.5.9 Safeguarding concerns should be reported directly to the police or social service whilst making the relevant Area Safeguarding Adviser aware.

Protection and support for whistle-blowers

10.5.10 We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

10.5.11 Whistle-blowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the HR team or your line manager immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

10.5.12 We do not condone threats or retaliation against whistle-blowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

10.5.13 However, if we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

10.5.14 Protect, formerly Public Concern at Work, operates a confidential helpline. Their contact details are Helpline: 020 3117 2520; Website: Protect

Whistleblowing Disclosure Flow-Chart

