

## OUR POLICY ON WHISTLEBLOWING

### What's this policy about?

We're committed to conducting our business with honesty and integrity and expect the same of our staff. We want to encourage you to report any suspected wrongdoing as soon as possible. We also want you to know that your concerns will be taken seriously and your confidentiality will be respected.

### Is this policy part of my contract of employment?

No, and we can change this policy at any time, but if any changes are made, we'll always make you aware of them. We may also vary things like time limits, if we feel we need to.

### Who's covered by this policy?

This policy applies to all employees, directors and other officers, workers and agency workers, volunteers and interns. We also require in any contracts with self-employed consultants or contractors that they comply with this policy, and we'll make sure they're given access to a copy. All these people are referred to as **'Staff'** in this policy.

### Who's responsible for this policy?

While we ask all managers to take responsibility for making sure this policy is complied with, its successful operation also depends on you. Please take the time to read and understand it and to go back to your manager with any questions you may have.

If we say 'Directors' in this policy, we mean the most senior people within our organisation who are responsible for reviewing the effectiveness of actions taken when responding to concerns that you or other Staff may raise.

### What is whistleblowing?

Whistleblowing is raising a genuine concern about a dangerous or illegal activity or any wrongdoing within our organisation. This may include things like fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, bribery, helping tax evasion, and any breach of legal or professional obligations.

If you're concerned about your personal circumstances, such as how you've been treated at work, and your concerns are unlikely to be in the public interest, then this is not the right policy to be looking at. Instead, you can use our Grievance Procedure or Anti-harassment and Bullying Policy.

### How do I raise a whistleblowing concern?

We hope that in most cases you'll be able to raise a concern with your manager. If you prefer not to raise it with them for any reason, please contact a Director.

We'll arrange a meeting with you as soon as possible to discuss your concern. You

can bring a colleague or union representative with you as long as they respect the confidentiality of your disclosure and any subsequent investigation.

## How confidential is this process?

We hope that you'll feel able to voice any whistleblowing concerns openly. However, if you want to raise your concern confidentially, we'll do our best to keep your identity secret. If it's necessary for anyone investigating your concern to know your identity, we'll discuss this with you.

Please be aware that an investigation may be more difficult or impossible if you keep your identity anonymous, as we won't be able to obtain further information from you.

## Will I have to report my concerns outside of the organisation?

Our aim with this policy is to provide an effective internal process for reporting, investigating and remedying any genuine concerns you may raise. We therefore don't expect that you'll need to alert anyone outside of our organisation. However, the law may require you to report your concern to an external body (such as a regulator).

We strongly encourage you to seek advice before reporting a concern to anyone external. You can contact the charity **Protect** who have a confidential helpline. Their contact details can be found at the end of this policy.

## How will I be protected as a whistleblower?

It's understandable that you may be worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns, even if they turn out to be mistaken. This includes protecting employees from dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you think this may have happened to you, please tell {your manager} straightaway. If the matter isn't then resolved, you can raise it formally using our Grievance Procedure.

If any Staff threaten or retaliate against whistleblowers in any way, they may be subject to disciplinary action. However, if we decide that a whistleblower has maliciously made allegations that are untrue, they may also be subject to disciplinary action.

## And that's it... for now

We understand that things change, so we'll continue to review the effectiveness of this policy and make sure it's achieving its objectives.

## How do I contact Protect?

**Protect** is an independent whistleblowing charity. You can reach them at:

- their helpline number: 020 3117 2520,
- their contact form: <https://protect-advice.org.uk/contact-protect-advice-line/>,
- their website: [www.protect-advice.org.uk](http://www.protect-advice.org.uk).