



# Bookmark

## Whistle-Blowing Policy

# Whistle-Blowing Policy (Employees and Volunteers)

## Background

The charity is committed to conducting its activities with honesty and integrity, and expects all individuals who are involved or associated with the charity – including Trustees, employees and volunteers – to maintain its high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring, or to address them if they do occur.

The aims of the charity's Whistle-blowing Policy are:

- to encourage all individuals who are involved or associated with the charity to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- to provide all individuals who are involved or associated with the charity with guidance as to how to raise those concerns.
- to reassure all individuals who are involved or associated with the charity that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.

## 1. What is whistle-blowing?

Whistle-blowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity
- miscarriages of justice
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligation or regulatory requirements
- financial fraud or mismanagement



# Bookmark

## Whistle-Blowing Policy

- negligence
- breach of the charity's internal policies and procedures
- conduct likely to damage the charity's reputation
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of the charity's activities (a whistle-blowing concern) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the [Grievance Procedure](#), [Compliments and Complaints Policy](#), or [Anti-harassment and Bullying Policy](#) as appropriate.

For the Bookmark Whistle-blowing Policy to apply, you must be giving your information to us in good faith. This means that you must believe it to be substantially true and you must not act maliciously or make false allegations or seek any personal gain.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the Chief Executive Officer or a member of the Board of Trustees.

## 2. Raising a whistle-blowing concern

The charity hopes that in many cases, you will be able to raise any concerns with your line manager (employees) or Community Manager (volunteers). You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

However, where the matter is more serious, or you feel that your line manager or Community Manager has not addressed your concern, or you would prefer not to raise it with them for any reason, you should contact one of the following:

- the Chief Executive Officer; or
- a member of the Board of Trustees.

The charity will arrange a meeting with you as soon as possible to discuss your concern. You may bring a friend or carer (volunteer) or colleague or union representative (employee) to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

The charity will take down a written summary of your concern and provide you with a copy after the meeting. The charity will also aim to give you an indication of how they propose to deal with the matter.



# Bookmark

## Whistle-Blowing Policy

### 3. Confidentiality

The charity hopes that all individuals who are involved or associated with the charity will feel able to voice whistle-blowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, the charity will discuss this with you.

The charity does not encourage individuals who are involved or associated with the charity to make disclosures anonymously. Proper investigation may be more difficult or impossible if the charity cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible and have been made in good faith. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Chief Executive Officer or Board of Trustees and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistle-blowing charity, who offer a confidential helpline.

### 4. External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the charity. In most cases you should not find it necessary to alert anyone externally.

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. It will very rarely - if ever - be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistle-blowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern.

Whistle-blowing concerns usually relate to the conduct of individuals who are involved or associated with the charity - including trustees, employees and volunteers - but they may sometimes relate to the actions of a third party. The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, the charity encourages you to report such concerns internally first. You should contact your line manager (employee), Community Manager (volunteer), or the Chief Executive for guidance.

### 5. Investigation and outcome

Once you have raised a concern, the charity will carry out an initial assessment to determine the scope of any investigation. The charity will inform you of the outcome of its assessment. You may be required to attend additional meetings in order to provide further information.



# Bookmark

## Whistle-Blowing Policy

In some cases, the charity may appoint an investigator (which could be external) or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the charity to minimise the risk of future wrongdoing.

The charity will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the charity giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If the charity conclude that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, they will be subject to disciplinary action.

### 6. If you are not satisfied

While the charity cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Chief Executive Officer, any member of the Board of Trustees or the charity's external auditors.

### 7. Protection and support for whistle-blowers

It is understandable that whistle blowers are sometimes worried about possible repercussions. The charity aims to encourage openness and will support all who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

All individuals who are involved or associated with the charity must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Chief Executive Officer or member of the Board of Trustees immediately.

Whistle blowers must not be threatened or retaliated against by individuals who are involved or associated with the charity, in any way. Anyone involved in such conduct will be subject to disciplinary action.

### 8. Personnel responsible for implementing the policy

The Board of Trustees has overall responsibility for the effective operation of this policy but has delegated day-to-day responsibility for its operation to the SLT.

The Board of Trustees should review this policy from a legal and operational perspective at least once a year.



# Bookmark

## Whistle-Blowing Policy

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Executive Officer.