

Whistleblowing Policy

Document Control

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1.0 Purpose and Legal Basis

A robust whistleblowing policy is a cornerstone of the charity's commitment to accountability, integrity, and good governance. This duty to protect the charity's assets, reputation, and beneficiaries is a primary responsibility of the Board of Trustees. This policy provides a safe, formal, and reliable mechanism for individuals to raise serious concerns about potential wrongdoing without fear of victimisation, reprisal, or disadvantage. It is essential for maintaining the trust of our beneficiaries, donors, and the public.

1.1 Purpose

The core objectives of this policy are:

- To encourage any individual with a serious concern about any aspect of the charity's work to come forward and voice that concern as early as possible.
- To provide clear and accessible guidance on how a concern can be raised and to explain how the charity will investigate and respond.

- To provide assurance that any genuine concern raised under this policy will be treated seriously, confidentially, and investigated in an appropriate and timely manner.
- To establish the charity's unwavering commitment to protecting whistleblowers from any form of harassment, victimisation, or other detriment.

1.2 Legal and Regulatory Basis

This policy is grounded in the legal and regulatory framework governing charities in the United Kingdom. It is designed to ensure compliance with the fundamental duties of trustees under the **Charities Act 2011, which requires them** to act in the charity's best interests and protect its assets and reputation, as mandated in the charity's Constitution. The policy upholds the principles of the **Public Interest Disclosure Act 1998**, which provides a framework for protecting individuals who raise legitimate concerns about certain types of wrongdoing. Furthermore, it reflects best practice guidance from the **Charity Commission**, which requires charities to have clear and effective whistleblowing procedures as part of a strong governance framework.

This document outlines the scope of the policy's application to ensure its principles are upheld across all of the charity's activities.

2.0 Scope

A clearly defined scope is a prerequisite for the consistent and fair application of this policy, ensuring that all individuals associated with the charity understand their rights and responsibilities under this framework. This policy applies to all activities undertaken by, or on behalf of, the charity.

2.1 Who This Policy Applies To

This policy is binding upon every individual and group associated with the charity, including:

- The Board of Trustees
- Any future staff and volunteers
- All contractors or third parties acting on behalf of the charity
- All grant applicants and recipients

2.2 What This Policy Covers

This policy is designed to handle serious concerns about potential wrongdoing that are in the public interest. These are often referred to as 'qualifying disclosures' and include, but are not limited to, genuine concerns related to:

- Criminal offences, including financial malpractice such as fraud, bribery, or corruption.

- A failure to comply with any legal or professional obligation or regulatory requirement.
- Actions that have, or are likely to, endanger the health and safety of any individual.
- Potential miscarriages of justice.
- Damage to the environment.
- The deliberate concealment of information relating to any of the above matters.

This policy reflects the charity’s formal commitment to openness and integrity, as articulated in the following statement.

3.0 Policy Statement

The charity is committed to the highest standards of conduct and governance. We encourage anyone who has a genuine concern about wrongdoing or malpractice within the charity to come forward and raise that concern. The Board of Trustees provides a guarantee that all concerns will be treated seriously and investigated appropriately. Furthermore, the charity gives its unequivocal assurance that no person will suffer any negative repercussions, victimisation, or disadvantage for raising a concern in good faith under this policy.

To ensure this statement is applied consistently, the following definitions clarify the key terms used throughout this policy.

4.0 Definitions

Clear, shared definitions are a prerequisite for the consistent interpretation and application of this policy. The following terms are defined in the context of the charity's specific operations.

Term	Definition
Whistleblowing	The act of raising a genuine concern about a danger, risk, or wrongdoing that affects others, specifically within or related to the activities of the charity.
Protected Disclosure	The legal term for a qualifying whistleblowing concern raised in good faith that is protected by the Public Interest Disclosure Act 1998.

The Charity / CIO	The charity is a Charitable Organisation as defined in its Constitution.
Trustee	A charity trustee of the charity, responsible for the overall management and control of the charity as defined in Clause 9 of the Constitution.

These definitions underpin the operational procedures that must be followed for raising and investigating concerns.

5.0 Procedures

This section provides the essential operational framework of the policy. It details the practical, step-by-step procedures for raising, handling, and investigating a concern, as well as the protections afforded to whistleblowers.

5.1 How to Raise a Concern

Individuals wishing to raise a concern under this policy should follow this procedure:

1. Concerns should be raised in writing whenever possible to ensure that all details are precise and can be accurately documented.
2. The concern should be reported directly to the **Chair of the Board of Trustees**.
3. If the concern relates to the actions of the Chair, it should be reported to the **Treasurer**. If the concern involves both the Chair and the Treasurer, it should be reported to any other trustee.
4. The report should provide as much information as possible to facilitate a thorough investigation, including the background and history of the concern, relevant dates, names of individuals involved, and the reason why you are concerned.

5.2 Confidentiality and Anonymity

The charity is committed to protecting the identity of anyone who raises a concern. The identity of the whistleblower will be kept confidential wherever possible and will not be disclosed without their prior consent. All personal data will be handled in strict compliance with the charity's **Overall Data Protection Policy (charity/DP/009)** and the **UK GDPR**. A distinction is made between confidential and anonymous reporting. While anonymous reports will be considered and investigated where possible, conducting a thorough investigation can be more challenging if further information cannot be obtained from the source.

5.3 Investigation Process

Upon receiving a concern raised under this policy, the Board of Trustees (or a delegated committee thereof) will ensure a prompt, independent, and impartial investigation is conducted. The Board will acknowledge receipt of the concern and take all necessary steps to assess its validity. If the Board determines there is sufficient evidence of serious wrongdoing, it will report the matter to the appropriate external authorities, which may include the **Charity Commission**, the **police**, or other relevant regulatory bodies.

5.4 Protection for Whistleblowers

The charity has a zero-tolerance approach to the harassment or victimisation of any person who raises a concern in good faith under this policy. No individual will be at risk of suffering any form of retribution, such as dismissal, disciplinary action, or any other disadvantage, as a result of speaking up. Any instance of such conduct will be treated as a serious disciplinary matter by the Board.

5.5 Raising Concerns Externally

This policy encourages individuals to raise concerns internally first to give the charity an opportunity to address the issue. However, the policy recognises that it may be appropriate in certain circumstances for an individual to report a concern directly to an external body, such as the Charity Commission.

These procedures are enacted by individuals with clearly defined roles and responsibilities.

6.0 Roles and Responsibilities

The assignment of clear responsibilities is fundamental to ensuring accountability and the effective implementation of this whistleblowing framework.

6.1 The Board of Trustees

The Board of Trustees holds ultimate accountability for this policy. The Board is responsible for fostering a culture in which individuals feel safe and confident in raising concerns, and for ensuring that all reports are thoroughly, fairly, and in accordance with the procedures outlined in this document.

6.2 The Chair of the Board

The Chair of the Board acts as the designated point of contact for receiving all concerns raised under this policy. The Chair is responsible for ensuring the process is managed confidentially and for initiating the appropriate response and investigation in consultation with the full Board.

6.3 All Trustees, Volunteers, Contractors, and Grant Applicants

All individuals associated with the charity have a personal responsibility to act with integrity and to report any genuine concerns about potential wrongdoing in line with the procedures set out in this policy.

The following section details the formal plan for embedding this policy into the charity's operations.

7.0 Implementation

This section details the formal plan for embedding the policy into the charity's operations and culture, ensuring it functions as an active safeguard for the organisation's integrity.

7.1 Effective Date

This policy is effective immediately upon its formal adoption by the Board of Trustees.

7.2 Communication

This policy will be made available to all trustees, volunteers, and contractors. Its principles will be clearly referenced in relevant documentation and induction materials to ensure all parties associated with the charity are aware of their rights and responsibilities.

The effective implementation of this policy is maintained through its ongoing review.

8.0 Monitoring and Review

Systematic monitoring and regular review are essential to ensure this policy remains effective, relevant, and compliant with the law and best practices.

8.1 Reporting

A confidential record of all concerns raised under this policy, and the outcomes of any subsequent investigations, will be formally reported to and reviewed by the full Board of Trustees. This review, along with the decisions made, will be formally minuted to create an auditable record of the Board's oversight, facilitate organisational learning, and enable the strengthening of internal controls.

8.2 Annual Review

This policy will be formally reviewed by the Board of Trustees on an annual basis to ensure its continued fitness for purpose. The review date noted in the header of this document will be updated upon the completion of each review.

This policy forms part of an integrated suite of governance documents that work together to protect the charity.

9.0 Related Policies and Documents

This policy does not exist in isolation but operates as part of an integrated governance framework. It must be read in conjunction with other key documents to ensure a comprehensive and consistent approach to risk management and compliance. Key related policies include:

- Charity Constitution
- Internal Financial Controls Policy (charity/FIN/004)
- Risk Management Policy (charity/GOV/002)
- Conflict of Interest Policy (charity/GOV/001)
- Complaints Handling Policy (charity/GOV/004)
- Anti-Fraud Policy (charity/FIN/005)
- Overall Data Protection Policy (charity/DP/009)