

## **1 Policy Statement: Performance Management – Whistleblowing**

We are committed to supporting and developing high performing teams in which individuals are well supported to succeed in their roles and therefore to contribute to the success of the organisation. We will operate a developmental performance management framework which makes clear the expectations of employees, provides support and development where desirable and lays down the arrangements to be put in place in the event of underperformance. We will ensure that performance decisions are evidence based, non-discriminatory, fair and equitable.

This policy outlines the arrangements for raising concerns about suspected wrongdoing or dangers at work – “whistleblowing”

## **2 Employer Responsibilities**

We shall:

- Encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and their confidentiality respected;
- Provide staff with guidance on how to raise a concern, both within the organisation and outside of it, as outlined in the procedure at annex 1;
- Discourage staff from making disclosures anonymously due to the limitations that may place on any investigation;
- Identify a nominated individual to act as the whistleblowing officer, ensuring that these responsibilities are placed outside of the CEO and finance officer’s remits;
- Treat alleged whistleblowing matters sensitively and with due respect for the privacy of individuals, insofar as the law allows;
- Reassure staff that they are able to raise genuine concerns in good faith without fear of reprisal;
- Use the disciplinary process in the event that false allegations have been made maliciously or in the event that whistleblowers are bullied or threatened in any way.

## **3 Employee Responsibilities**

Employees shall:

- Attempt to resolve any concerns in the first instance with their line manager, unless the matter feels too serious or the concern is about that manager;
- In those cases, report any concerns about suspected wrongdoing at the earliest opportunity, using the steps outlined in annex 1;

- Treat any information held as part of the whistleblowing case as confidential and only reveal it through the appropriate routes;
- Co-operate with any whistleblowing investigation by providing honest and factual evidence to support that investigation;
- Never maliciously make allegations through the whistleblowing procedure;
- Never threaten or bully a colleague on the grounds of involvement in a whistleblowing case.

#### 4 References and tools support the Policy

##### Definitions

Whistleblowing: the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity
- Danger to health and safety
- Damage to the environment
- Failure to comply with legal or regulatory requirement
- Fraud or financial impropriety
- Unauthorised disclosure of confidential information
- Concealing any of the above

External helpline – Public Concern at Work: 0207 404 6609, [www.pcaw.co.uk](http://www.pcaw.co.uk)

Whistleblowing officer – Independent Council Member

#### 5 Policy Review Arrangements

This policy will be reviewed at least annually.

---

For office use only

Policy title	Performance management – whistleblowing
Policy version	approved
Policy author	CEO
Policy consultation	25.11.15-01.12.16
Policy approval (trustees / Council)	21.11.15
Policy training and dissemination	01.12.15
Policy review date	Nov 2016

## Annex 1: The Whistleblowing Procedure

This formal whistleblowing procedure shall be used where informal discussions have failed to address the matter; where the concern is more serious; or where those concerns involve your line manager.

- 1 Use the whistleblowing procedure if you have any concerns about colleagues' behaviours or practices with regard to the list in the "definitions" section of the policy. If in doubt, practices or behaviours which look like they may break any laws should be processed under this procedure. The exception to this is child welfare concerns which must be treated under the "health and safety – protection of children and vulnerable adults" policy.
- 2 Put your concerns in writing to the whistleblowing officer, who will not be the CEO or the finance officer. If your concern is about the whistleblowing officer, put your concerns to the CEO. Do not disclose your concerns to anyone else at this stage and never contact the media.
- 3 You may disclose concerns under this policy anonymously, but in the interests of proper investigation you are discouraged from taking this route. We will take all reasonable steps to protect your identity but it may not always be possible to do so. Should this not be possible (eg by disclosing your identity to any investigation team) we will always discuss this with you first.
- 4 The whistleblowing officer will arrange a meeting with you as soon as possible to discuss your concerns. You may bring a colleague with you to any meeting arranged under this policy. You and any representative who accompanies you must respect the confidentiality of the discussions at all times and only disclose information to the whistleblowing officer and any investigation team.
- 5 We will take a written record of your concern and provide you with a copy of it after the meeting. We will aim to give you an indication of our next steps.
- 6 Once the concern has been raised, we will determine the scope of any investigation and inform you of the outcome of this decision. You may be required to attend further meetings to discuss the allegations.
- 7 We aim to keep you fully informed about progress but recognise that the need for confidentiality may supersede this aim. The outcome from the whistleblowing case may not always be made available to you but we will confirm with you when the case is closed.

- 8 Should you have any concerns about repercussions from the case, you should raise these urgently with the whistleblowing office in the first instance and then using the grievance procedure if the matter remains unresolved.
- 9 If you are dissatisfied with the way in which your concern has been handled the matter should be referred to the whistleblowing officer in the first instance. Alternatively you may contact the Chair of Trustees, unless the holder of that office was the subject of your case, in which case you should refer to the Chair of Council.
- 10 You can take independent advice about your role in a case at any time through using the Public Concern at Work helpline.

