Whistleblowing Policy

Policy & Guidelines

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Signed:	
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1.0 INTRODUCTION

1.1 **Our Commitment**

Concrete Rose is committed to the highest standards of quality, integrity, professionalism and accountability. We expect these standards of all our team; employees, board members, hosts, contractors, agency workers and volunteers. However, we recognise that there may be occasions when we, or those in our team, do not meet these high standards, and that there may be the need for genuine and serious concerns to be raised. This policy outlines how you, as a member of the Concrete Rose team, can raise such concerns and how these concerns will be handled.

1.2 **Aims of the policy**

The aims of this policy are to:

- Provide an effective way for you to raise serious concerns
- Ensure that there is a process of feedback on any action undertaken as a result of you raising concerns
- Ensure that you are protected from reprisals or victimisation for having raised concerns in good faith
- Signpost you to options available to you if you are dissatisfied with our response, or if internal investigation is not appropriate
- Allow Concrete Rose to take action against any employee who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so.

1.3 **Who this policy applies to**

This policy applies to all employees (including those designated as sessional workers, temporary agency staff, authorised volunteers, students or work experience placements), our hosts, board members and those contractors working for Concrete Rose or on any Concrete Rose premises (e.g. freelance workers).

1.4 **Defining whistleblowing**

'Whistleblowing' is a term used to refer to the internal or external disclosure of malpractice as well as illegal acts, or omissions, at work. It covers, for example, how we raise funds, how we commission work or make payments.

1.5 **Protecting individuals using this policy**

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 and it provides protection for individuals who raise legitimate concerns about specified matters. These are called qualifying disclosures. A qualifying disclosure is one made in good faith by an individual who has a reasonable belief that:

- A criminal offence (including fraudulent and corrupt behaviour, e.g. theft, fraud or malpractice)
- A miscarriage of justice
- An act creating a risk to health and safety

- An act causing damage to the environment
- A breach of any other legal obligation,
- Sexual harassment or
- Concealment of any of the above.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed but you do need to hold a reasonable belief that such an act is being, has been, or is likely to be, committed. If you make such a protected disclosure, you have the right not to be dismissed, subjected to any other detriment, or victimised. This is the case even if it materialised that you were genuinely mistaken. We will not tolerate any individual being subjected to a detriment as a result of their making a disclosure in good faith. Under the law, interns, contractors or volunteers, are not afforded the same legal protection that is afforded to employees. However, in order to promote and encourage an open and honest environment in which concerns can be freely raised we will, in so far as is possible, treat all individuals making a disclosure in the spirit of the Public Interest Disclosure Act 1998.

1.6 **Malicious disclosures**

If it is found that you have maliciously raised a matter which you know to be untrue or you are involved in any way in the malpractice, wrongdoing or illegal acts or omissions, your behaviour may be addressed through disciplinary procedures.

1.7 **Non-whistleblowing concerns**

This policy is only to be used in the relation to the circumstances outlined in section 5, above. There are a number of other Concrete Rose policies that are relevant in other circumstances. This includes matters of safeguarding and child protection (Safeguarding Policy), and equality and diversity (Equality and Diversity Policy).

1.8 **Confidentiality**

All concerns will be treated in confidence and every effort will be made not to reveal your identity if you so wish. At the appropriate time, however, you may need to come forward as a witness. We will consider anonymous disclosures, but we do not encourage them as anonymity often makes it difficult to properly investigate concerns, protect employees or give feedback on outcomes.

2.0 RAISING A CONCERN

2.1 **Ways to report a concern**

You should raise your whistleblowing concern as soon as possible. This will make it easier to act and to enable any problems to be resolved or reported quickly. Concerns should be raised verbally or in writing outlining:

- Any relevant context and background, including relevant dates, venues, names etc
- The reason why the situation causes for concern.
- That the concern is being raised in line with the Whistleblowing Policy
- Whether you wish your identity to be kept confidential.

2.2 **Who should I raise my concerns with?**

In the first instance you should raise concerns with your line manager. Where this is not appropriate (for example, where they may be involved in the alleged malpractice, wrongdoing or illegal acts or omissions in some way) raise your concern with their manager. Failing this option you can report concerns to the directors of Concrete Rose or a member of the Advisory Board.

2.3 **Contact options**

Mike Farrington (Director): mike@concreterose.co.uk // 07881926728

Matt Negus (Director): matt@concreterose.co.uk

James Bennett (Director and Head of Advisory Board): james.bennett@romseymill.org

2.4 After raising a concern

Your disclosure will be acknowledged within three working days. It will be investigated by the manager or senior officer with whom you have raised your concern. They will arrange to meet you as soon as possible, away from the workplace if necessary, to enable you to explain your concern. You will be informed either at this meeting or as soon as possible thereafter, what action will be taken to address the concern you have raised. Where action is not taken, you will be informed and given an explanation. The action taken in response to a disclosure will depend on the nature of the concern. Typically, the matters raised may result in one or more of the following:

- No action required
- Action being taken under other NSPCC policy or procedure
- An internal investigation under this policy
- A referral to the police or relevant statutory body
- An independent enquiry.

Any Concrete Rose manager or senior officer receiving a potential whistleblowing concern must notify a director or the head of the advisory board immediately that a concern has been raised and inform them of progress in resolving the concern.

2.4 **Raising a concern externally**

We strongly encourage you to exhaust the internal processes set out above in the first instances. In exceptional or urgent circumstances, however, or where, having made a disclosure, you are unhappy with the outcome, you have a legal right to make a disclosure to prescribed bodies. These include but are not limited to:

- Advertising Standards Authority (https://www.asa.org.uk/make-a-complaint.html)
- Citizens Advice (0808 223 1133);
- The Health and Safety Executive (0300 003 1647);
- Financial Ombudsman (https://www.financial-ombudsman.org.uk/make-complaint);
- The Environment Agency (03708 506 506 or 0800 80 70 60 in an emergency)

- The Fundraising Regulator (0300 999 3407 or complaints@fundraisingregulator.org.uk)

Similar to the rights and obligations of an employee, Concrete Rose reserves the right to make a referral to any of the above agencies without your consent.

2.5 **Contacting the press**

Disclosures to the press will not be considered reasonable and may constitute misconduct. As such, the matter might be treated as a disciplinary matter.

2.6 **Further help and assistance**

If, at any stage in the procedure, you are unsure about what to do and would like independent advice, you can discuss your concern with someone at Public Concern at Work. This body is an independent charity staffed by lawyers, which offers confidential free legal and practical advice on how people can raise concerns about malpractice at work. They can also provide advice about what legal protection may be available to you. You can email Public Concern at Work at whistle@pcaw.org.uk or phone them on their advice line: 020 3117 2520.