

Previous version	n/a
Review cycle	At least every two calendar years
Next update due	December 2027

Aim:

- To encourage reporting of suspected wrongdoing, in the knowledge that concerns will be taken seriously and investigated appropriately, and confidentiality will be respected,
- To provide guidance as to how to raise concerns, and
- To provide reassurance that genuine concerns can be raised without fear of reprisals.

## 1. WHO IS COVERED BY THIS POLICY?

- 1.1. This policy does not form part of any employee's contract of employment and it may be amended at any time. We may also vary elements, such as any time limits, as appropriate.
- 1.2. This policy applies to all staff, trustees, and volunteers, as well as anyone temporarily working with the charity. All such individuals are referred to as 'personnel' in this policy.

## 2. WHO IS RESPONSIBLE FOR THIS POLICY?

- 2.1. Trustees have overall responsibility for ensuring compliance with the law and the effective operation of this policy. We ask all personnel to take responsibility for helping to achieve the aims of this policy.

## 3. WHAT IS WHISTLEBLOWING?

- 3.1. Whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work. This may include: a) criminal activity, b) miscarriages of justice, c) danger to health and safety, d) damage to the environment, e) failure to comply with any legal or professional obligation or regulatory requirements, f) bribery, g) facilitating tax evasion, h) financial fraud or mismanagement, i) negligence, j) unauthorised disclosure or use of confidential information, or k) the deliberate concealment of any of the above matters.
- 3.2. A whistleblower 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 our activities that you think could be a matter of public interest (a whistleblowing concern) you should report it under this policy. This policy should not be used for complaints relating to your own personal circumstances that are unlikely to be in the public interest, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure (for staff) or Anti-harassment and Bullying Policy (for others) as appropriate.

## 4. RAISING A WHISTLEBLOWING CONCERN

- 4.1. We hope that in most cases you will be able to raise any concerns with your manager or with your regular contact in Number Champions. 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. In some cases, they may refer the matter to a trustee or external adviser.
- 4.2. However, where the matter is more serious, or you feel that your manager or contact has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the CEO or a trustee. They will arrange a meeting with you as soon as

possible to discuss your concern. You may be accompanied at this meeting, but your companion must respect the confidentiality of your disclosure and any subsequent investigation. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

## **5. CONFIDENTIALITY**

- 5.1. We hope that personnel will feel able to voice whistleblowing 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, we will discuss this with you.
- 5.2. We do not encourage personnel to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the CEO or a trustee and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, who offer a confidential helpline. Their contact details can be found at the end of this policy.

## **6. EXTERNAL DISCLOSURES**

- 6.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. However, if you believe a crime has been committed or is likely to be committed you should inform the police.
- 6.2. The law recognises that in some circumstances it may be appropriate for you to report your concern 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, such as from Protect's confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Protect's contact details are at the end of this policy.
- 6.3. Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party. In some circumstances, the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your manager or contact for guidance.

## **7. INVESTIGATION AND OUTCOME**

- 7.1. Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be asked to attend additional meetings, in order to provide further information.
- 7.2. In some cases, we may appoint an investigator, such as a staff member with relevant experience of investigations or specialist knowledge of the subject matter. The investigator may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 7.3. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us 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.
- 7.4. If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action as a staff member or action under the Volunteer Policy.

## **8. IF YOU ARE NOT SATISFIED**

- 8.1. While we 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.
- 8.2. If you are not happy with the way in which your concern has been handled, you can raise it with a Trustee. Alternatively, you may contact Protect for advice.

## **9. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS**

- 9.1. It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support personnel who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 9.2. Personnel must not suffer any detrimental treatment as a result of raising a genuine concern. 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 your manager or contact immediately. If the matter is not resolved, staff should raise it formally using our Grievance Procedure and volunteers under the Volunteer Policy.
- 9.3. Personnel must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct may be subject to disciplinary action.

## **10. MONITORING AND REVIEW OF THIS POLICY**

We will continue to review the effectiveness of this policy to ensure it is achieving its stated objectives.

## **11. CONTACTS**

- Protect - Helpline: 020 3117 2520 | [www.protect-advice.org.uk](http://www.protect-advice.org.uk)  
Contact form - <https://protect-advice.org.uk/contact-protect-advice-line/>
- Police: call 999 for emergencies, 101 for non-emergencies.
- For safeguarding issues, as per our Safeguarding Policy you can contact the NSPCC on 0808 800 5000.
- The Charity Commission has further information at: <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>.
- Number Champions CEO and Trustees - <https://www.numberchampions.org.uk/contact/>