

Whistleblowing Policy and Procedures

The Whistleblowing Policy is for anyone who might have a serious concern regarding a breach of our standards or conduct. This policy makes sure that if a person has a serious concern, they know how to raise it as soon as possible. The matter will be thoroughly investigated and the appropriate action taken.

Purpose

Whistlewood Common Limited is committed to ensuring that anyone using our facilities can do so in an enjoyable and safe environment. We recognise our duty of care to all our users when onsite and aim to promote the highest standards of transparency and accountability in everything we do.

These standards are set out in our values and vision, as well as our policies and procedures. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring unlawful or unethical conduct.

Whistlewood Common Limited aims to foster a culture of openness and accountability as essential to prevent such situations occurring and to address issues promptly and effectively when they do occur.

Whistleblowing enables genuine wrongdoing to be reported so that something can be done about it.

The Whistleblowing Policy applies to all individuals who use Whistlewood Common and who have a genuine concern about suspected wrongdoing or malpractice (within the relevant whistleblowing criteria explained below).

This policy ensures that if anyone has a genuine concern, they know how to raise it as soon as possible. Whistlewood Common Limited will take seriously any genuine concerns raised, will investigate as appropriate and will take all reasonable steps to ensure the person raising the concern is treated fairly, with dignity and respect.

Any individual who raises genuine concerns reasonably and responsibly will not be penalised in any way, even if they turn out to be mistaken.

Scope

Whistleblowing is the disclosure of information which relates to suspected wrongdoing, malpractice or dangers which falls outside the scope of other policies and procedures which may include:

- criminal activity
- miscarriages of justice
- danger to health and safety
- damage to the environment
- breach of a legal obligation or regulatory requirement
- bribery
- financial fraud or mismanagement
- unauthorised disclosure of confidential information
- breach of our internal policies and procedures
- conduct likely to damage our reputation or financial wellbeing
- the deliberate concealment of any of the above

A whistleblower is a person who raises a genuine concern relating to any of the above whistleblowing criteria in the public interest. Repeating gossip or making allegations dishonestly or maliciously is not considered whistleblowing (this does include the use of social media).

Whistlewood Common Limited can exercise its discretion to use a different policy to deal with any concerns. Our Whistleblowing Policy sits alongside our other policies.

This policy should not be used where the concern is of an individual or personal nature (so not in the public interest) where there is no genuine concern in relation to wrongdoing, malpractice, or danger. In these circumstances, a report should be made using the Complaints or Grievance Policy & Procedure.

Public interest means that you should not make a disclosure for personal gain. The following factors will be considered when determining whether someone has made a disclosure in the public interest:

- How many people the disclosure affects
- Which interests the disclosure affects
- The nature of the wrongdoing, malpractice or concern
- The identity of the alleged wrongdoer or subject of concern
- These are some examples of whistleblowing concern vs a complaint or safeguarding concern:
 - A concern that an individual is acting in an unsafe way towards a young person/adult at risk - this should be reported under our Safeguarding Policy & Procedure.

- A parent's complaint about their child's dietary requirements not being considered during an event - this should be reported under our Complaints Policy & Procedure.
- A disclosure that safety rules within the organisation are routinely being flouted, thus endangering safety - this should be reported under the Whistleblowing Policy & Procedure.
- Crimes against a person or property should be reported immediately to the police. If any person or property is at immediate risk the Police should be called immediately.

Complaints relating to discrimination, victimisation or harassment should be dealt with through our Anti-Bullying and Harassment Policy & Procedure.

If you have concerns about the behaviour of another organisation or private individual, you should raise the issue with them. You should follow their whistleblowing procedures, if they have them.

This policy does not replace other policies or procedures and should not be used to escalate matters that are being, or have been, dealt with under another of our policies and procedures. Whistleblowing should only be considered when there are the strongest of reasons not to use other ways to raise matters of concern.

If you are uncertain whether something is within the scope of this policy, we encourage you to seek advice from the Whistlewood Board or an independent person/advisor.

Whistleblowing Policy Guidance

A person who wishes to raise a concern that fits the whistleblowing criteria above should follow this Whistleblowing Policy. This includes if the incident is happening now, in the past or may happen in the future. It is important that the concern is raised without delay. On receipt of a whistleblowing report, our procedures set out in this policy will be put into effect.

Personal responsibilities

We expect all site users and members to:

- Work within the values of Whistlewood
- Report all concerns promptly using the correct policies and procedures
- Never stop or discourage someone from making a disclosure
- Never criticise or victimise anyone for making a disclosure

- Not raise concerns with any malicious intent
- Cooperate with any whistleblowing investigation under this policy, being open and timely in the provision of information

Whistlewood Common Limited responsibilities

We will:

- Take concerns seriously
- Acknowledge receipt of the whistleblowing concern within a period of five days
- Consider whistleblowing reports carefully and undertake a thorough and prompt investigation where appropriate
- Keep you informed as to progress of the investigation if you wish
- Understand the difficult position a volunteer may be in when raising a whistleblowing concern
- Seek appropriate advice
- Take prompt action to resolve the concern or refer it to an appropriate person
- If the need arises, and if appropriate, report the concern to external agencies
- Ensure individuals who genuinely report concerns are not penalised in any way
- Treat any retaliation against or threats to victimisation of whistleblowers as a serious matter that may lead to disciplinary action against the perpetrator

Deliberate misuse of this policy may lead action being taken, including suspension or termination of a role or membership.

How to report

If you are concerned about any form of malpractice covered by this policy, you should normally raise the issue with your Whistlewood named contact (Lead Volunteer) or a member of the board in the first instance. You may tell them in person or put the matter in writing. They may be able to agree on a way to resolve the concern quickly and effectively.

If you have raised your issues and you are still concerned, or the matter is so serious that you feel you cannot discuss it with any of the persons named above,

you should report your whistleblowing concern to the relevant authority (information about this is included at the end of the document).

Your report can be in writing, or email, or reported verbally. If your report is given verbally, a statement may be requested subsequently to aid any investigation.

Whistlewood Common Limited would encourage young people to speak to a parent, carer or trusted adult if they wish to report a matter through the Whistleblowing Policy so that they can be supported throughout the process.

Details required

- Your name - a report can be made anonymously, but Whistlewood Common Limited encourages the sharing of information where possible to enable the proper investigation of concerns (see section below on anonymity)
- A contact telephone number and/or email address so that contact can be maintained if you wish to be kept informed
- Who or what you are making a report about, including the names of the people involved
- Why you consider the matter falls within the whistleblowing criteria
- Where and when the events of the report happened
- Who else is aware of the issue
- Any action you or someone else has taken to address the issue
- The impact the concern has or may have on Whistlewood Common Limited

If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls within our safeguarding, complaints policy or other relevant procedure, we will let you know and will ask that you redirect your concern accordingly.

Any users contacted by Whistlewood Common Limited to provide information in relation to a whistleblowing investigation, must respond within an agreed timeframe.

Process

Action on receipt of a concern

Usually within five working days:

- Once the submission is received it will be acknowledged. We may contact you (the whistleblower) for clarification and/or make internal enquiries as appropriate
- The report will be recorded in the Whistleblowing Register
- Available information will be collected, including any documentation or statements supplied by you (the whistleblower)

- If anonymity has been requested, the Whistlewood board will decide whether anonymity will be agreed. Please note that if anonymity is agreed, this may limit the scope of the investigation
- We will conduct an initial assessment to consider whether the matter should be investigated and to determine the scope of any such investigation. Reference to the criteria in the Whistleblowing Policy, or other relevant regulatory guidance may be used to make this decision
- Depending on the outcome of the initial assessment, an impartial investigator may be appointed to investigate the matter in line with the procedures set out below
- On occasion, the report may be referred to external agencies/ bodies as appropriate

Usually within 10 working days, you (the whistleblower) will be provided with the following information:

- The outcome of the initial assessment
- Confirmation on whether the matter will proceed to investigation and, if so, the name of the investigator
- If the matter will not be proceeding to investigation, an update regarding what action, if any is being taken and the reasons why
- Details of the nominated person for contact
- What action has been taken
- An indication of the anticipated timeframe to conclude the matter
- Information about support and protection for the whistleblower

If it has been determined that the matter will not progress to an investigation and you are not satisfied with this outcome, you can seek independent advice.

Investigation

Where the outcome of the initial assessment has determined that an investigation is necessary, an impartial investigator will be appointed; investigators may be volunteers, board members or someone external to Whistlewood Common Limited as appropriate.

The investigator will undertake any further enquiries required and will review all relevant documentation. They may contact anyone they consider to be able to provide pertinent information.

If a person is required to attend a meeting regarding any investigation, they may request that an appropriate person attends with them to offer support. Any such

appropriate person must respect the confidentiality of the disclosure and any subsequent investigation.

Whistlewood Common Limited may decide to refer the investigation to a relevant external body or independent advisor. We may also halt any investigation or hand over the enquiry to another body or authority. The whistleblower will be informed of this decision.

In some instances, an individual may wish to inform an external body or regulator. This is usually only appropriate where an individual believes their concern has not been taken seriously by Whistlewood Common Limited and/or the matter raised is continuing, despite the matter being considered and/or investigated internally under this Whistleblowing Policy.

The independent whistleblowing charity, [Protect](#), operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

It will very rarely, if ever, be appropriate to use the media (including social media) to raise your concerns. Whistlewood Common Limited strongly advise that any Whistleblower seeks appropriate advice before reporting a concern to anyone external.

The investigation will be conducted in a manner proportionate to the circumstances. It may be proportionate to conduct a summary investigation, without documentation, where the report and outcome is communicated orally only.

All information in relation to any investigation will be treated as confidential. A report will be compiled by the investigator/s and will only be shared with the Board of Directors (unless any of them are implicated in the case).

To maintain confidentiality and in keeping with our legal obligations, it may not always be possible to give you (the whistleblower) specific details of the investigation or the outcome of any investigation, but you will be informed when the investigation has been completed.

If you raised a genuine concern, we would not take any action against you if the investigator does not uphold the concern.

In all cases, Whistlewood Common Limited will use the Whistleblowing Register to monitor progress, keep track of any investigation and any actions that need to be taken.

The Register will be kept updated stating:

- The name and status of the whistleblower
- The date on which Whistlewood Common Limited received the whistleblower's report of a concern

- The nature of the whistleblowing concern
- Details of the person who received the whistleblowing report
- Whether it is to be investigated and by whom
- The outcome of the investigation
- Learning identified from the incident
- What action or change has been implemented because of the incident
- Any recommendations to be considered and by when

The Register will be confidential.

Confidentiality and anonymity

All whistleblowing matters will be treated in confidence. Whistlewood Common Limited will not reveal your identity other than to the nominated investigator. There may be circumstances when Whistlewood Common Limited will be required to identify you:

- Where there is a duty to refer to statutory agencies
- Where the matter results in court proceedings and you are required to give evidence
- Where it is required to progress an investigation
- If the matter is subsequently handled under a different process (e.g. complaints/safeguarding procedure)

Every effort will be taken by Whistlewood Common Limited to notify you if the above becomes applicable. We hope that everyone 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.

We do not encourage anonymous disclosures. However, if you have a grave concern, it is better for us to be informed anonymously than not at all. However, to enable a thorough investigation and to be able to substantiate any claims, it is always preferable for you to supply your details.

Any request for anonymity will be considered at the discretion of the Whistlewood Board. In exercising this discretion, the following will be considered:

- The seriousness of the issue raised
- The credibility of the allegation
- Whether the allegation can realistically be investigated from factors or sources other than the whistleblower

Protection and support for Whistleblowers

It is understandable that whistleblowers are sometimes concerned about repercussions. Whistlewood Common Limited encourages openness and will support anyone who raise genuine concerns under this policy, even if they turn out to be mistaken and no wrongdoing is found.

Whistlewood Common Limited want to promote and encourage an open and honest environment where concerns can be freely raised. We will treat all individuals making a genuine whistleblowing concern in the spirit of the Public Interest Disclosure Act 1998.

- No person will suffer any detrimental treatment because of raising a genuine whistleblowing concern. Detrimental treatment includes termination of your volunteering role, threats or other unfavourable treatment connected with raising a concern
- If an individual experiences any such unfavourable treatment from volunteers, members, or site users, this must be reported to the contact dealing with the investigation immediately
- Members, volunteers, and others must not threaten or retaliate against whistleblowers in any way
- Anyone involved in such conduct may be subject to sanctions
- Whistlewood Common Limited will take all reasonable steps to protect whistleblowers from any negative or unfavourable treatment because of their report and support them throughout any investigation. We treat all concerns consistently, fairly and professionally
- Those who raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest may be liable to sanctions and/or legal action; they will not be protected under this policy

Appeals

We will try to deal with your concerns fairly and in an appropriate way, but we cannot always guarantee the outcome you are seeking. If at the conclusion of an investigation under this whistleblowing process, you are not satisfied with the outcome you may appeal the decision.

You have grounds for appeal if you believe that the correct process has not been followed or have additional information that you wish to be considered. In these circumstances, you may appeal to the Whistlewood Board of Directors within 30 days of being notified of the outcome.

Further information & contacts

The independent whistleblowing charity, Protect, operates a confidential helpline and can be contacted via its website.

Protect helpline: 020 3117 2520

Protect website: <https://protect-advice.org.uk>

View Whistlewood Common Limited Policies & Procedures at:

www.whistlewoodcommon.org

Responsibility & review

The Whistlewood Board has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

This policy is due for review:

- every 24 months
- following any legislative changes
- following any learning by Whistlewood Common Limited
- any change in jurisdictional guidance,
- Whichever comes first.

Approved: WW Board GT,AC,PJ,RD,FG,CG

DATE: 02/09/2025