

Whistleblowing Policy

Planned review	Date Mar 2025	Who HoPo
----------------	---------------	----------

Contents

		Page
1	About this policy	3
2	Purpose	3
3	Concerns covered by this policy.	3
4	Who does this policy apply to?	4
5	Who is responsible for this policy?	4
6	If I make a disclosure, will it be handled confidentially?	4
7	Untrue disclosures	5
8	How do I make a disclosure?	5
9	Other useful resources	6
10	Review and approval.	7

1. About this policy

- 1.1 'Whistleblowing' is a term used to describe reporting certain types of potential wrongdoing at work.
- 1.2 Barnwood Trust is committed to the highest standards of openness, integrity, and accountability. This policy provides the method for any employee or others working on behalf of the Trust who have genuine concerns regarding possible malpractice or wrongdoing that they may raise such concerns at the earliest stage possible and that the Trust guarantees that the matter will be treated seriously and investigated properly.
- 1.3 This policy also provides employees with protection from detriment once such concerns are raised if disclosures are made in the reasonable belief that the disclosure shows malpractice.

2. Purpose

- 2.1 This policy aims to:
 - Encourage employees and those working with the Trust to raise serious concerns, to question them and act upon them;
 - Provide an avenue where such concerns can be raised;
 - Ensure feedback regarding the concern is received and confirm how to further pursue if not satisfied with the initial response; and
 - Reassure employees that they will receive protection from detriment, reprisal and or harassment for making a disclosure.
- 2.2 This policy is designed to enable all employees and those working with the Trust to raise concerns in relation to specific issues, which are in the public interest, and they believe show potential malpractice or impropriety, as set out in section 3.
- 2.3 This policy does not apply to personal grievances concerning an individual's terms of employment or other aspects of the working relationship, or disciplinary matters. Such matters will be dealt with through other relevant procedures.

3. Concerns covered by this policy.

- 3.1 This policy deals with specific concerns, which are in the public interest and may include concerns that:

- A criminal offence has been committed or is being or is likely to be committed.
- A person has or is or is likely to fail to comply with a legal obligation.
- A miscarriage of justice has occurred or is or is likely to occur.
- The health and safety of an individual has been or is likely to be endangered.
- The environment has been or is likely to be damaged.
- That information tending to show any matter falling within the above categories has been or is likely to be deliberately concealed.

4. Who does this policy apply to?

- 4.1 This policy refers to the following groups of people who work for and with the Trust.
- 4.2 Disclosures should be made without malice. People reporting concerns should have facts to support their belief that the breach falls within one of the items listed above.

Who might need to use this policy?	Where will they find it?
Employees, Apprentices, and work placement students, temporary, agency and casual staff.	Employee Intranet / Website.
Trustees	Trustee Portal.
Freelance workers and self-employed contractors	Website. A link to the policy will be provided in your contract.

5. Who is responsible for this policy?

- 5.1 The Leadership Team has overall responsibility for the effective operation of this policy but has delegated day to day responsibility for overseeing its implementation to the Head of People and Operations.
- 5.2 This policy has been reviewed and approved by our Leadership Team. It is reviewed annually by the Head of People and Operations.

6. If I make a disclosure, will it be handled confidentially?

- 6.1 We will treat all disclosures in a confidential and sensitive manner. The identity of the person making the allegation may be kept confidential

if by doing so the investigation is not hindered. In some circumstances, the investigation may reveal the source of the disclosure and the person may need to provide a statement as evidence for the investigation to continue.

- 6.2 We will treat any anonymous disclosures seriously. A full and thorough investigation will be carried out. People making an anonymous disclosure should however understand that the effectiveness of an investigations may be hindered by the anonymity of the discloser.

7. Untrue Disclosures

- 7.1 If an employee makes an allegation in good faith which upon investigation is not confirmed, no action shall be taken against them. However, if an employee makes allegations that are malicious, frivolous, for personal gain or persists in making such allegations, disciplinary action may be taken against them.

8. How do I make a disclosure?

- 8.1 In the first instance, any concerns should be raised with the Chief Operating Officer or Head of People and Operations who will arrange an investigation of the matter.
- 8.2 The investigation may involve the person raising the concern and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Statements will be considered, and those reporting concerns will be asked to comment on any additional evidence obtained.
- 8.3 The person investigating will take any necessary action, including reporting the matter to the Chair of the Board of Trustees and any appropriate government department or regulatory agency. The person investigating will also invoke any disciplinary action required.
- 8.4 On conclusion of any investigation, the person raising the concerns will be told the outcome and what the Trust has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.
- 8.5 If the person who has raised concerns feels that the Chief Operating Officer or Head of People and Operations are involved in the

wrongdoing, have failed to make a proper investigation or have failed to report the outcome of the investigations to the relevant person, they should escalate the matter to the Chief Executive. The Chief Executive will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the Chair of the Board of Trustees.

8.6 If on conclusion of the stages above the person who has raised concerns reasonably believes that the appropriate action has **not** been taken, they should report the matter to the relevant external body. This includes:

- HM Revenue & Customs
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority

You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014

9. Other useful resources

9.1 Related policies for employees

- This procedure is for disclosures about matters other than a breach of an Employment Contract.
- Employees should raise concerns about breaches of Employment Contracts via the grievance policy and procedure.
- The disciplinary procedure is referenced within this policy as the process that would be used to investigate employee misconduct.
- These employee policies can be found by employees on the IRIS HR System under Company Handbook / Employee Handbook.

9.2 Contact details:

- Chief Operating Officer – Nicola.Mosley@barnwoodtrust.org
- Head of People and Operations – Jennie.Curtis@barnwoodtrust.org
- Chief Executive – Sally.Byng@barnwoodtrust.org

Overton House main line: 01242 539 935

The Public Interest Disclosure (Prescribed Persons) Order 2014 can be found via:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf

10. Review and Approval:

- 10.1 This policy has been approved by the Leadership Team and will be reviewed on an annual basis (or sooner if there are changes to the law) by the Head of People and Operations.

Document Control				
Issue No.	Issue Date	Issued by	Approved by	Review Date
1	March 2024	Head of People and Operations	Leadership Team	March 2025