



Whistleblowing Policy

Safe Passage International

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SAFE PASSAGE WHISTLEBLOWING POLICY

ABOUT THIS POLICY

Safe Passage is committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards. However, all charities face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are:

- To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide staff with guidance as to how to raise those concerns and how those concerns will be handled.
- To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, volunteers, officers, consultants, contractors, casual workers and agency workers.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

PERSONNEL RESPONSIBLE FOR THE POLICY

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

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information where a worker reasonably believes (and it is in the public interest) that one or more of the following matters is either happening, has taken place, or is likely to happen in the future:

- Criminal activity;
- Financial impropriety;
- Failure to comply with any legal requirements;
- Danger to physical and mental health and to safety;
- Damage to the environment;
- Safeguarding breaches or concerns;
- The deliberate concealment of any of the above matters.

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 (a **whistleblowing concern**) you should report it under this policy.

This policy should not be used for complaints relating to your own personal circumstances (in such a case, you should use the Grievance Procedure), unless this relates to a broader public interest concern in one of the above categories.

RAISING A WHISTLEBLOWING CONCERN

We hope that in most cases you will be able to raise your concern with a manager. You may tell them in person or put the matter in writing if you prefer. There may be a way of resolving your concern quickly and effectively.

However, where you feel that your manager has not addressed your concern, or you feel unable to raise it with them for any reason, you should speak to the CEO, HR or another manager. If none of these options are appropriate you should contact either of the trustee safeguarding leads Bishop Jonathan Clark and Marta Welander at:

bishop.jonathan@southwark.anglican.org and marta_welander@hotmail.com

The individual contacted must arrange a meeting with you as soon as possible to discuss your concern and invite HR unless not appropriate. You may bring a colleague or designated representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

A written summary of your concern will be taken and you will be provided with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

CONFIDENTIALITY

We hope that staff 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 beforehand.

We do not encourage staff 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.

INVESTIGATION AND OUTCOME

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 required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including staff (or external specialists) with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

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.

IF YOU ARE NOT SATISFIED

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.

If you are not happy with the way in which your concern has been handled, you can raise it with senior management or a trustee.

EXTERNAL DISCLOSURES

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.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator, if you feel unable to use the organisation's procedures. In such cases, the disclosure should be made to a prescribed person or body, guidance on who is available here: <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>

Whistleblowing concerns usually relate to the conduct of staff, but they may sometimes relate to the actions of a third party, such as a client, donor or service provider. 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/Operations Manager or, if appropriate, senior management or a trustee for guidance.

PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a 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 a manager or, if appropriate, senior management or a trustee immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

No one should threaten or retaliate against whistleblowers in any way. If an individual is found to have been involved in such conduct they may be subject to disciplinary action.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower could be subject to disciplinary action.