

The Squad

Whistleblowing Policy

Date	Description	Responsibility of:	Review Date:
DRAFT	Policy		

1. Purpose

- 1.1** All organisations face the risk of things going wrong or of unknowingly harbouring wrongdoing. The Squad believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. You are therefore encouraged to report any wrongdoing by The Squad or its volunteers which you believe has occurred, is occurring or is likely to occur. By encouraging a culture of openness to raise legitimate concerns within our organisation, The Squad believes it can help prevent malpractice.
- 1.2** The procedure below should be used if there is anything you think The Squad should know about, which may include or lead to:
- a criminal offence
 - corruption or bribery
 - failure to comply with legal obligations
 - miscarriage of justice
 - health and safety danger
 - environmental risk
 - a concealment of any of the above
- 1.3** This policy is separate from The Squad's Complaint policy. If you have concerns about wrongdoing within The Squad covered in 1.2 you should use the procedure outlined in this policy. If you are not sure which procedure to use, the Chair of Trustees of The Squad will be able to advise you.
- 1.4** By knowing about malpractice at an early stage, The Squad stands a good chance of taking the necessary steps to safeguard the interests of all employees and protect the organisation.
- 1.5** Provided you reasonably believe the information you disclose is in the public interest and shows wrongdoing, it will not normally matter if you are mistaken. The law protects workers who have reported such wrongdoing from reprisals by their employer (or its agents) or their colleagues.

1.6 Employees should be aware that they can be held personally liable as well as, or instead of, The Squad for the detrimental treatment of someone who has reported wrongdoing. The Squad will not tolerate reprisals or detrimental treatment of any kind. Examples of detrimental treatment include:

- Bullying
- Harassing
- Threatening
- Side-lining
- Singling out
- Unjustifiably disciplining an employee because they have reported wrongdoing or invoked this procedure.

1.7 Neither this policy nor any part of it is intended to have a contractual effect.

2. Aim

2.1 We recognise that you may not always feel comfortable about discussing your concerns internally, especially if you believe The Squad itself is responsible for the wrongdoing. The Public Interest Disclosure Act 1998 provides statutory protection for employees and other workers who

report wrongdoing within the workplace (commonly called “whistleblowers”).

2.2 The aim of this policy is therefore to ensure that all employees are confident that they can raise any matter with The Squad that concerns them, in the knowledge that:

- it will be taken seriously
- it will be treated as confidential where requested
- that no action will be taken against them

3. Procedure

- 3.1** If appropriate you can first discuss the matter with the Club Leader. [\[CP1\]](#) At this stage, if you specifically request it, the matter will be treated as completely confidential and will not result in any report to anyone within The Squad unless you agree or unless required by law. However, with your permission, the Club Leader will speak to the appropriate Trustee and agree a course of action.
- 3.2** If you feel you cannot tell the Club Leader, or if the matter concerns the Club Leader, please raise the matter with the Chair of the Trustee Board.
- 3.4** You are encouraged wherever possible to agree to the matter being passed on to the appropriate people so that it may be properly dealt with. Please be aware that even if the person you tell agrees to confidentiality, others may try to deduce your identity and may potentially assume you are responsible for a disclosure if, for example, you have previously discussed your concerns with colleagues.
- 3.5** After you have raised your concerns, The Squad will decide how to respond in a responsible and appropriate manner under this policy. If the matter requires further investigation (whether formal or informal) an investigation will be carried out and you will be informed of its outcome and what, if any, action has been taken. However, The Squad will not be able to inform you of any matters which would infringe the duty of confidentiality owed to others.
- 3.6** If you remain unhappy with the speed or conduct of the investigation or the way in which the matter has been resolved, you should refer the matter to the Chair of the Trustee Board. They will tell you the result when they have investigated the matter and what, if any action has been taken, again subject to the confidentiality owed to others.
- 3.7** The Squad gives its assurance that no worker who makes a genuine report under this procedure will be subjected to any detriment by The Squad as a result. In the event that you believe you are being subjected to a detriment by any person within The Squad as a result of your decision to invoke the procedure you must inform the Chair of the Trustee Board immediately and appropriate action will be taken to protect you from any reprisals.

- 3.8** Any employee who, after investigation, is thought to be guilty of threats or reprisals against a colleague who has disclosed wrongdoing or invoked this procedure will be subject to disciplinary action. Such behaviour may be regarded as gross misconduct.
- 3.9** If it should become clear that false allegations have been made for purely malicious reasons or to pursue a personal grudge against another employee, this could constitute misconduct and in appropriate cases will be dealt with in accordance with Disciplinary procedures.
- 3.10** There may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary The Squad reserves the right to make a referral without your consent.
- 3.11** The Squad would expect that in almost all cases, raising your concerns internally would be the most appropriate action for you to take. However, if you feel you cannot raise your concerns internally, and you honestly and reasonably believe the information and any allegations are true, you should consider raising the matter with the appropriate recognised regulator, for example the Charity Commission. Details of the relevant regulator can be obtained from Public Concern at Work (PCAW), an independent charity which aims to promote compliance with the law and good practice (www.pcaw.co.uk).
- 3.12** If you have any queries about raising your concerns which you feel you cannot ask internally, PCAW also operates a helpline where you can confidentially discuss whether and how best to raise your concerns, details of which are available on the website. If you contact the helpline please ensure they are aware of the contents of this organisational policy.
-