



# Whistleblowing Policy

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# 1. Purpose of Policy

## 1.1. Purpose:

- 1.1.1. A policy providing guidance on the procedure for making protected disclosures, and the personnel to whom they should be made.
- 1.1.2. We are committed to conducting our business with honesty and integrity, and we expect all employees and volunteers to maintain high standards in accordance with our Code of Conduct. However, all organisations 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.
- 1.1.3. The aims of this policy are:
  - a) To encourage employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers 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.
  - b) To provide employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers with guidance as to how to raise those concerns.
  - c) To reassure employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.1.4. This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.
- 1.1.5. This policy does not form part of any employee's contract of employment and the Charity may amend it at any time.

## **1.2. To whom the policy applies:**

1.2.1. This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers (“relevant person(s)”).

## **1.3. Definitions:**

1.3.1. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- a) criminal activity;
- b) failure to comply with any legal or professional obligation or regulatory requirements;
- c) miscarriages of justice;
- d) danger to health and safety;
- e) damage to the environment;
- f) bribery under our Anti-corruption and Bribery Policy;
- g) facilitating tax evasion
- h) financial fraud or mismanagement;
- i) breach of our internal policies and procedures, including our Code of Conduct and Dignity at Work policy;
- j) Any abuse or harassment including of a sexual nature
- k) conduct likely to damage our reputation or financial wellbeing;
- l) unauthorised disclosure of confidential information;
- m) negligence;
- n) animal abuse.
- o) the deliberate concealment of any of the above matters.

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

## **2. Policy Statements**

### **2.1. Statements:**

2.1.1. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Grievance Procedure or The Dignity at Work Policy as appropriate.

2.1.2. If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer: Phillippa Caine, Association Secretary via email at [speakoutatguidedogs@guidedogs.org.uk](mailto:speakoutatguidedogs@guidedogs.org.uk) or via telephone at 07990 540058.

## **2.2. Responsibilities:**

- 2.2.1. The Audit & Risk Committee has overall responsibility for this policy and reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 2.2.2. The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 2.2.3. The Whistleblowing Officer, in conjunction with the Audit & Risk Committee should review this policy from a legal and operational perspective at least once a year.
- 2.2.4. All relevant persons are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Relevant persons are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Whistleblowing Officer.

## **2.3. Monitoring:**

- 2.3.1. All whistleblowing incidents are monitored and reported to the Chairman of the Audit & Risk Committee and CEO, subject to him/ her not being conflicted, and, where appropriate, to the Audit & Risk Committee and Board of Trustees.

## **2.4. Documentation**

None identified at this time

## **2.5. Permissible exceptions**

None identified at this time

## **2.6. Related Policies or Processes:**

- Whistleblowing Procedure
- Grievance Procedure

- The Dignity at Work Policy
- The Investigation Procedure

## 2.7. Governance Review & Approval Table:

The table below contains two rows and five columns.

	<b>H&amp;S</b>	<b>Protection of Children &amp; Adults</b>	<b>Insurance</b>	<b>Legal</b>
Date Reviewed				

## 2.8. Version control table:

The table below contains three rows and four columns. (Only the original approval date and the most recent amendment should be included in the table.)

<b>Date</b>	<b>Version</b>	<b>Status</b>	<b>Details of Change</b>
16/02/18	V1.0	Approved	Phillippa Caine/Guy Perring Association Secretary/ Head of Legal
10/02/2021	V4.0	Approved	Changes were to incorporate recommendations from Internal Audit Phillippa Caine, Association Secretary
04.02.22	V4.1	Approved	Notification email address changed by Phillippa Caine, Association Secretary

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