



Whistleblowing Policy

Purpose of the Policy

We are committed to conducting our peer support activities with honesty and integrity; 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 or to address them when they do occur.

The aim of the policy is to:

- Encourage you to report suspected wrong doing as soon as possible, in the knowledge that your concerns will be taken seriously and investigated as appropriate, and that your confidentiality will be respected.
- Provide guidance as to how to raise those concerns.
- Reassure you that you can raise genuine concerns in good faith without fear of reprisals, even if you turn out to be mistaken.

Policy Scope

This guidance applies to The Compassionate Friends employees and volunteers and replaces all previous policies and guidance in respect of its subject matter as of the date of issue.

Policy Definition

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.

This may include:

- Criminal activity
- Miscarriages of justice
- Danger to health and safety
- Damage to the environment
- Failure to comply with any legal obligation or regulatory requirements
- Bribery and corruption
- Money laundering or terrorist financing
- Negligence; Conduct likely to damage our reputation
- Unauthorised disclosure of confidential information;
- Breach of our TCF's specific security policies;
- Improper conduct or unethical behaviour
- The deliberate concealment of any of the above matters.

A whistle-blower is a person who raises a genuine concern in good faith 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, such as the way you have been treated at work, as a volunteer with TCF or as a beneficiary of TCF support. In those cases, if you are a staff member you should refer to the TCF Grievance & Disciplinary Policy. If you are a volunteer you should refer to the relevant section of the Volunteer Agreement. For those who are beneficiaries of TCF support you should refer to the TCF Complaints Policy.

This policy is a statement of good practice, it is not contractual and does not form part of an employee's terms and conditions or a volunteer agreement. The Compassionate Friends will vary the policy from time to time as it considers reasonable and appropriate to comply with its legal obligations, good practice or by way of periodic review.

Procedures

RAISING A WHISTLEBLOWING CONCERN

- It is hoped that in many cases you will be able to raise any concerns with your line manager or if you are a volunteer, with a staff team member. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.
- Where, however, the matter is more serious, or you feel that your line manager or staff team member has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following Whistleblowing Officers:-

Safeguarding – Nisha Shah doctornishashah@gmail.com

Legal – Sefton Kwasnik sefton@ozonlaw.com

Financial – Ken Barclay ken.barclay@hotmail.co.uk

- The recipient of the communication from the whistleblower will be required to initiate an investigation.
- A meeting will be arranged with you by the recipient of the communication as soon as possible to discuss your concern. You may bring a colleague 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 down and we will provide you with a copy after the meeting. It is an aim that we will give you an indication of how we propose to deal with the matter.
- You will not suffer any detrimental treatment as a result of raising a concern in good faith. If you believe that you have suffered any such treatment, you should inform Chair of the Board of Trustees. If the matter is not remedied you should raise it formally using the Staff Handbook, Volunteer Agreement or Complaints Policy (if you are a beneficiary of TCF)

- It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure.
- In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.
- Staff members, volunteers or TCF beneficiaries must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

CONFIDENTIALITY

- It is hoped that Employee's will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, every effort to keep your identity secret will be made.
- If it is necessary for anyone investigating your concern to know your identity, this will be discussed with you.

UNTRUE ALLEGATIONS

- If you make an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against you.
- If, however, you makes malicious or vexatious allegations, and particularly if you persist with making them, disciplinary action may be taken against you.

ANONYMOUS ALLEGATION

- You are encouraged not to make disclosures anonymously as this may make proper investigation more difficult if information from you cannot be obtained.
- Whistleblowers who are concerned about possible reprisals if their identity is revealed should contact the Whistleblowing Champion and discuss measures that can be taken to preserve confidentiality.
- If you are in any doubt, you can seek advice from Protect, the independent Whistleblowing Charity, who offer a confidential helpline. Their contact details are at the end of this policy.

INVESTIGATION AND OUTCOME

- Once you have raised a concern, an initial assessment will be carried out to determine the scope of any investigation. You will be informed of the outcome of the assessment. You may be required to attend additional meetings in order to provide further information.
- In some cases, an investigator or team of investigators including staff and trustees with relevant experience of investigations or specialist knowledge of the subject matter will be appointed.
- The investigator(s) may make recommendations for change to enable The Compassionate Friends to minimise the risk of future wrongdoing.
- It is an 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 it is concluded that a whistleblower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

EXTERNAL DISCLOSURE

- 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.
- No parties are entitled to disclose concerns to the media, press or social networks.
- It is strongly encouraged that you seek advice before reporting a concern to anyone external. The independent Whistleblowing Charity, Protect, operates a confidential helpline.
- Whistleblowing concerns usually relate to the conduct of staff or volunteers, but they may sometimes relate to the actions of a third party, such as a beneficiary, supplier or service provider.
- The law allows you to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, it is encouraged you report such concerns internally first by contacting your line manager or relevant staff team member.

IF YOU ARE STILL CONCERNED

- While a guarantee cannot be provided regarding the outcome you are seeking, your reporting will be dealt with 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 the Whistleblowing Champion.

TRAINING

The training on the Whistleblowing Policy should be included in staff and volunteer induction.

ADVICE AND SUPPORT

Protect (Independent Whistleblowing Charity)	https://protect-advice.org.uk/contact-protect-advice-line/ Advice line number: 020 3117 2520
Whistleblowing Officers	Safeguarding – Nisha Shah doctornishashah@gmail.com Legal – Sefton Kwasnik sefton@ozonlaw.com Financial – Ken Barclay ken.barclay@hotmail.co.uk

Conclusion

In conclusion, a whistleblowing policy is an essential component of any organisation's commitment to transparency, accountability, and ethical conduct. It serves as a vital mechanism for employees and volunteers to report concerns about misconduct, illegal activities, or violations of company policies without fear of retaliation. By implementing a well-defined whistleblowing policy, organisations can protect their employees, stakeholders, and their own reputation.

A successful whistleblowing policy should include clear procedures for reporting, maintaining confidentiality, conducting thorough investigations, and ensuring appropriate follow-up actions. It should also emphasise the organisation's commitment to non-retaliation, providing reassurance to potential whistleblowers that they can come forward with their concerns without fear of reprisal.

Ultimately, a robust whistleblowing policy not only helps prevent and address wrongdoing within an organisation but also fosters a culture of integrity and accountability. It sends a powerful message that unethical behaviour will not be tolerated, and that the organisation is dedicated to upholding its values and ethical standards.

Incorporating a whistleblowing policy as part of an organisation's overall governance framework is a responsible and proactive approach to maintaining trust and promoting ethical behaviour, both internally and externally. By continuously reviewing and improving this policy, organisations can adapt to changing circumstances and reinforce their commitment to ethical conduct in the long term.

Data protection

We will process any personal data collected in accordance with our data protection guidance on processing special categories of personal data. Data collected from the point at which we become aware of the issue is held securely and accessed by, and disclosed to, individuals only for the purposes of providing the necessary support.

Monitoring and review

This guidance will be reviewed periodically to ensure compliance with any changes in UK legislation and/or best practices. Any updates or amendments to the guidance will be communicated to all staff and volunteers in a timely manner.

This guidance will be reviewed by the Trustees every 3 years.

Revision history

Version	Type (e.g., replacement, revision etc...)	Date	History (reason for changes)	Signature/Job Title
V1	Original	01/10/2023		
V2	Replacement	01/10/2026	Legislative and compliant update	