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| **Policy title: Whistleblowing policy** | |
| **Policy type & number:** HR 11A | Owner: CEO |
| **Policy category:**  mandatory/~~general~~/~~specific~~ | Review cycle: 3 years |

**Policy document**

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| Author | Approved by | Effective date |
| CEO | RNC | 22/04/2021 |

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| Distribution | All staff and volunteers |

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| Change history | | | |
| Version | Author | Date | Summary of changes |
| D1 | Gill Taylor | 18/3/21 | Amended policy and procedure |
| V2 | Jane Petit | 19/03/21 | Separation of policy and procedure |
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**Whistleblowing policy**

1. **Why we have this policy** 
   1. Foothold is committed to being open, honest and accountable. It encourages a free and open culture in its dealings between the Board of Trustees and staff and volunteers
   2. This policy aims to help Board members, volunteers and staff to raise any serious concerns they may have about colleagues or their employer’s actions or practices with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result
   3. It is written in the context of the Public Interest Disclosure Act 1998 which protects employees who ‘blow the whistle’ on malpractices within their organisation. It also complies with the Code of Fundraising Practice 2017
   4. This policy meets the requirements of all relevant employment legislation
2. **Who is this policy for?**
   1. All staff
3. **What happens if managers do not follow this policy?**
   1. If managers do not follow this policy, employees may not be given all their employment rights, may suffer a detriment and may go to tribunal
   2. **Breach of this policy may result in:** 
      1. Staff dissatisfaction and not getting their rights
      2. Reputational damage to Foothold
      3. Financial penalties in additional costs of tribunal claims

1. **Policy**
   1. **What types of concerns?**

The policy is intended to deal with serious or sensitive concerns about wrongdoings such as the following:

* + a criminal offence
  + a failure to comply with any legal obligation
  + a miscarriage of justice
  + fraud or corruption
  + the mistreatment of beneficiaries
  + unauthorised use of Foothold’s money or resources
  + breaches and abuses of Foothold’s own policies
  + a health and safety risk to an individual
  + damage to the environment
  + concerns regarding the organisation’s Fundraising practices
  + or concealment of the above.

* 1. It is not necessary for individuals who raise the concern to prove the wrongdoing that is alleged to have occurred or is likely to occur
  2. However, if an individual knowingly or maliciously makes an untrue allegation (e.g. in order to cause disruption within or about Foothold), Foothold will take appropriate disciplinary action against them. It may constitute gross misconduct
  3. Individuals should note that they will not be protected from the consequences of making a disclosure if, by doing so, they commit a criminal offence
  4. This policy does not deal with any complaints staff may have about their employment. This should be dealt with through Foothold’s Grievance Procedure. Any issues volunteers have with their volunteering should be raised under the volunteer agreement
  5. Foothold’s Dignity at Work policy offers protection to workers against harassment, bullying and discrimination
  6. Community members should make complaints or raise concerns through the Comments, compliments and complaints procedure

1. **Queries and Comments**

If you have any queries regarding how this policy works in practice, or comments or suggestions as to how it could be improved, please contact the CEO.