charitable incorporated organisation number 1183921

Whistleblowing Policy

1. Introduction

Taunton Welcomes Refugees (TWR) is committed to the highest possible standards of openness, probity, accountability and behaviour amongst its staff and volunteers. However, TWR acknowledges that all organisations face the risk of their activities going wrong from time to time, or of unknowingly harbouring malpractice.

1.2 TWR believes it has a duty to take appropriate measures to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the organisation.

1.3 TWR expects all staff and volunteers to maintain high standards in accordance with the Handbook and Code of Conduct Agreement and to report any wrongdoing that falls short of these fundamental principles. It is the responsibility of all staff and volunteers to raise any concerns that they might have about malpractice within the organisation.

1.4 It should be emphasised that this policy is intended to assist individuals who believe that they may have discovered a malpractice or impropriety. It is not designed to question operational, financial or strategic decisions taken by the Trustees nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

2. What is whistleblowing?

2.1 Whistleblowing is the disclosure of information by an individual which relates to some danger, fraud or other illegal or unethical conduct in the organisation.

2.2 The Public Interest Disclosure Act 1998 governs the making of disclosures concerning workplace activities and is intended to protect employees who blow the whistle on a bad practice from being subjected to any detriment or unfairly dismissed as a result. Under the Employment

Rights Act 1996, workers who become whistle-blowers are protected where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur.
2.3 TWR's Whistleblowing Policy and Procedure, as set out, is in line with the Act. TWR is a relatively small charity which is primarily run by volunteers. The Board of Trustees have overall responsibility for implementing the policy. However, the Board of Trustees will appoint an appropriate Investigating Manager (IM) to investigate individual cases under this policy.

3. Scope of policy

3.1 The aim of this policy is to ensure that TWR staff, its volunteers, its suppliers and partners are confident that they can raise any matter of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

4. What concerns are covered?

4.1 Staff complaints relating to personal circumstances in the workplace should use the Grievance Procedure as appropriate.
4.2 This policy should be used where you have a genuine concern and reasonable grounds for believing that there may be a malpractice within the organisation.

These concerns could include:-

- committing a criminal offence (e.g. fraud, corruption or theft)
- failure to comply with a legal obligation
- endangering health and safety of an individual
- sexual, emotional, or physical abuse or ill treatment or exploitation of beneficiaries, customers or staff
- damage to the environment
- financial malpractice or fraud
- potential miscarriage of justice
- funds being used in an unauthorised manner
- TWR's policies and procedures or Employee Handbook have not or are not being observed or are being breached by a member of staff, volunteer or the Trustees.
- other unethical conduct, including attempts to conceal any of the above

4.3 TWR values any concerns reported in good faith under this procedure. If you are uncertain whether the matters concerning you are within the scope of this policy (for example, if you are suspicious but uncertain as to whether

the law has been broken, or whether a person is acting outside the scope of their authority), we encourage you to report the concerns to a Trustee who will treat the matter with complete confidence.
4.4 If you are unsure about whether to use this policy and procedure or require independent advice at any stage, you may contact:
• your trade union
• the charity Protect (www.protect-advice.org.uk) either via their advice line 0203 117 2520 or via email. It is recommended you use your private email address or phone number. They can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work. They also provide translation services.

5. Safeguards

5.1 Protection and support for whistleblowers
No member of staff who raises genuinely held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action. Detriment includes unwarranted disciplinary action and victimisation. If you believe that you are being subjected to a detriment within the workplace as a result of raising concerns under this procedure, you should inform a Trustee immediately. Employees or volunteers who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.
5.2 Confidentiality
TWR will do its best to keep the identity of an individual who makes a disclosure under this policy confidential. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity.
5.3 Anonymous Allegations
TWR recognises that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. However, we cannot guarantee to investigate all anonymous allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feedback, or ascertain whether your disclosure was made in good faith. It is preferable for whistleblowers to reveal their identity to the Investigator and measures can be taken to preserve confidentiality if appropriate.
5.4 Untrue Allegations

If an investigation under this procedure concludes that a disclosure has been made maliciously, vexatiously, in bad faith or with a view to personal gain, the whistleblower may be subject to disciplinary action.

6. Personnel responsible for implementation of policy

6.1 The Trustee Board has overall responsibility for TWR policy on whistleblowing but may appoint an appropriate individual Investigating Manager (IM) to review and investigate the complaint being raised and report back to the Trustee Board.

7. How to raise a concern

7.1 We recognise that you may not feel comfortable discussing concerns with your
direct line manager or project leader and therefore initial concerns may be raised with either a Co-Chair or a Trustee. You can email the Chairs using the TWR email address chair@tauntonwelcomesrefugees.co.uk
7.2 TWR will always endeavour to handle investigations promptly and fairly, but if you have raised a concern and you are not satisfied with the investigation or its conclusion, you should write directly to the Chair of the Trustee Board detailing your concerns.
7.3 It is possible that your concern may relate to the actions of a third party, such as a client or supplier. It may be appropriate for you to raise your concerns directly with the third party where you believe that the malpractice identified relates solely or mainly to their conduct or a matter which is their legal responsibility. In doing so you should ensure that no disclosure of confidential information takes place, as the Public Interest Disclosure Act does not provide blanket protection and could leave you vulnerable to disciplinary or other action, if you disclose confidential information not covered by the Act.
7.4 TWR would ask that you consult the Trustee Board before speaking to the third Party.

8. How should a disclosure be made?

8.1 Your concerns should be raised with either a Co-Chair or Trustee orally or in writing. You must state that you are using the Whistleblowing Policy and specify whether you wish your identity to be kept confidential. You will be asked to formalise your concerns in writing either before or after the first meeting with a member of the Trustee Board or the appointed IM.
8.2 The Trustee will acknowledge receipt of your formal written disclosure and provide details of the IM who has been appointed to review and investigate your complaint. Records will be kept of further action taken.

8.3 You are entitled to be accompanied by a workplace colleague or a TWR volunteer at any meeting with the IM appointed under this procedure. Your companion will be asked to respect the confidentiality of your disclosure and any subsequent investigation.

9.Timescales

9.1 TWR aims to deal with all disclosures in a timely manner and with due regard to the rights of all individuals involved.

10. Investigating procedure

10.1 TWR is committed to investigating disclosures fully, fairly, quickly and confidentially where circumstances permit. Following your submission of a formal written disclosure, the Trustee Board (or another individual acting in their place) will acknowledge receipt within five working days.
10.2 The length and scope of the investigation will depend on the subject matter of the disclosure. The IM will carry out an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation. A report will be produced for the Trustee Board and, where appropriate, you will also receive a copy.
10.3 So far as is appropriate and practicable, you will be kept informed of the progress of the investigation.
10.4 TWR recognises that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after our investigation. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.
10.5 If you are not satisfied with the outcome or explanation given to you following the investigation, you should raise the matter with the appropriate organisation or body, e.g. the Police, the Environment Agency, Health and Safety Executive or Social Services Department.

11. Corrective action and appliance

As part of the investigation into concerns raised under this policy, recommendations for change will be invited from the IM to enable TWR to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered.

12. Monitoring and reviewing of the policy

12.1 This policy reflects the law and TWR's practice as at May 2024. The Trustee Board is responsible for reviewing this policy from a legislative and operational perspective annually.
12.2 The Trustee Board has responsibility for ensuring that any personnel who may be involved with administration or investigations carried out under this policy receive appropriate training to assist them with these duties.