

WHISTLEBLOWING POLICY AND PROCEDURES

Summary:

This document sets out the AUKE policy and procedure for dealing with concerns raised in relation to specific issues which are in the public interest. For the purpose of AUKE policies, we will use the term ‘whistleblowing’.

Version Control:

Current version	3
Approved by	Trustee Board
Approval date	
Next review date	

Version History:

Version	Date	Main Changes	Changed by
3	January 2021	Full refresh	CEO
2	January 2018		Compliance

1. SCOPE

This policy is designed to deal with concerns raised in relation to specific issues which are in the public interest.

These are:

- The unauthorised use of Age UK Enfield's (AUKE's) Funds
- Possible fraud or corruption
- Sexual, emotional or physical abuse or ill treatment or exploitation of beneficiaries or staff
- Health and safety risks (including risks to the public as well as other employees or the potential for harm)
- Conduct which is an offence or breach of the law
- Disclosures related to miscarriages of justice (where AUKE has acted improperly or unfairly)
- Damage to the environment
- Other unethical conduct, including any deliberate concealment of any of the above.

2. POLICY

AUKE encourages staff to raise in good faith concerns s/he may have regarding any procedure or practice within the organisation.

AUKE will ensure that any member of staff who makes a disclosure along the lines listed above will not be penalised or suffer any adverse treatment for doing so.

However, if a member of staff who does not act in good faith or makes an allegation without having reasonable grounds for believing it to be true or makes it for purposes of personal gain, maliciously or vexatiously may be subject to disciplinary proceedings.

This policy only applies to issues which fall outside the scope of AUKE's other policies and procedures.

The policy will not apply to personal grievances concerning an individual's terms and conditions of employment or other aspects of the working relationship such as complaints of bullying or harassment or disciplinary matters. Such complaints will be investigated under the applicable procedure.

Should it become apparent to the investigator, during the course of any investigation into a Public Disclosure complaint, that the concern relates more appropriately to another procedure, that procedure will be invoked.

3. PROCEDURE

If you have a concern about malpractice, it is hoped that you will be able to raise it first with your line manager. This will obviously depend upon the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

If you believe that your immediate line management is involved or you feel for whatever reason unable to raise it with your line manager, you should then raise the issue with the Chief Executive. If you have concerns about raising the issue with the Chief Executive then you should contact the Chair of Trustees.

If your concern involves a Trustee then you should go to the Chief Executive.

You should put your name on the complaint. Your identity will be kept confidential, if so requested, for as long as possible provided that this does not prejudice the enquiry.

Anonymous complaints are not covered by this procedure, but may be investigated or acted upon as the person receiving the complaint believes to be appropriate, having taken into account the seriousness of the issue raised, the credibility of the complaint, the prospects of being able to investigate an anonymous complaint and fairness to any individual mentioned in the complaint.

Any concerns raised will always receive a response. This will entail either an investigation by management or a person independent of management (the Investigating Officer).

Within ten working days of a concern being raised, the Investigating Officer will write to you:

- acknowledging the concern has been received
- indicating how it is proposed to deal with the matter
- giving an estimate of how long it will take to complete the investigations
- telling you whether any initial enquiries have been made
- supplying you with information on how AUKE will support you if you think this is necessary.

The amount of contact between you and the person considering the matter will depend on both the nature of the matter raised, the potential difficulties involved and the clarity of the information provided.

Steps will be taken to minimise any difficulties which you might experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings, arrangements will be made for you to receive advice about the procedure.

If you feel that AUKE has not responded correctly at any stage, remember that you can go to the other levels and bodies mentioned above. You can also call the independent whistleblowing charity [Protect](#) for free and confidential advice on 020 3117 2520.

While it cannot be guaranteed that all matters will be addressed in the way that you might wish, it will always be our intention to handle the matter fairly and properly. By using the policy, you will help achieve this.

If you do take the matter outside AUKE, you must ensure absolutely that you do not disclose confidential information.

In the event of your concern not being substantiated you should not take any subsequent action or make any disclosure to anyone other than those referred to in this policy.

4. REPORTING BY NON-EMPLOYEES

While the majority of disclosures will be made by employees, there is scope within the legislation for non-employees, volunteers and associated persons to raise whistleblowing concerns.

5. DISCLOSURE TO THE MEDIA

Unauthorised statements to the media by any persons employed, volunteering or associated with AUKE are never an accepted form of whistle blowing.

If any employee, volunteer or any other associated person makes any unauthorised statement to the media, it will be treated as serious misconduct and in the case if an employee may be the subject to disciplinary action, up to and including dismissal.