

Whistleblowing Procedure

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Document Owner: Marianne Millard - Association Secretary

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1.0 Purpose of Procedure

1.1 Purpose

1.1.1 This procedure provides guidance on how to make protected disclosures, and the personnel to whom they should be made.

1.2 To whom the procedure applies:

1.2.1 All employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers (“relevant person”).

2.0 Procedure Instructions

2.1 Raising a Whistleblowing concern

- 2.1.1 We hope that in many cases you will be able to raise any concerns with your line manager. 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. In some cases, they may refer the matter to the Whistleblowing Officer.
- 2.1.2 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following, their contact details are set out at the end of this procedure in the appendix at section 8:
- The Whistleblowing Officer: **Marianne Millard - Association Secretary**
 - The CEO or Head of Legal
- 2.1.3 We will arrange a meeting with you as soon as possible to discuss your concern; all meetings will be held in line with our [guidelines for inclusive meetings](#) but please share any particular requirements you may have with the investigating officer prior to the meeting.
- 2.1.4 You may be accompanied by a colleague or a Staff Representative to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. Any colleague or representative invited to join any meeting cannot be called on as a witness during the process.
- 2.1.5 We will take down a written summary of your concern and provide you with a copy after the meeting. You will be given the opportunity to check

the document and correct any errors. You may be asked to provide additional information to the investigating officer.

- 2.1.6 Where it is necessary for the investigating officer to interview witnesses, witnesses may be accompanied by a colleague or a Staff Representative. A summary of the conversation will be shared with the witness after the meeting and the witnesses will be given the opportunity to check the document and correct any errors. Witnesses must respect the confidentiality of any meetings.
- 2.1.7 The organisation does not allow any meetings relating to the Whistleblowing complaint to be recorded.

2.2 Confidentiality

- 2.2.1 We hope that as a relevant person you will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 2.2.2 We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in appendix 1 and appropriate measures can then be taken to preserve confidentiality. If you remain uncomfortable, you can disclose your concern to Safecall, an external whistleblowing service provider, who offer a confidential helpline. Their contact details are listed in appendix 1.
- 2.2.3 If an anonymous disclosure is made, the person receiving the disclosure will try to assess whether the caller's claims can be corroborated; determine if the situation is urgent and could cause immediate harm to others, if this is the case, the Police will be informed but if it is not urgent and it is felt that the disclosure may have some substance, an investigation will be considered.

2.3 Investigation and Outcome

- 2.3.1 Once you, as a relevant person, have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will

inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

- 2.3.2 In some cases, we may appoint an external investigator or team of investigators with specialist knowledge of the subject matter to carry out the investigation into the disclosure. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 2.3.3 We will 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.
- 2.3.4 As part of the investigation, we will share our findings with a third party such as the Police or Charity Commission where we are obliged to do so.
- 2.3.5 If we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower will be subject to disciplinary action.

2.4 If you are not satisfied

- 2.4.1 While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this procedure, you can help us to achieve this.
- 2.4.2 If you are not happy with the way in which your concern has been handled, you can raise it with the Head of Legal or the CEO; alternatively, you can contact the Chairman of the Audit & Risk Committee or our external auditors whose contact details are set out in the appendix.

2.5 External disclosures

- 2.5.1 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. It will rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The external Whistleblowing provider, Safecall, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are set out in the appendix.
- 2.5.2 Whistleblowing concerns usually relate to the conduct of our employees and volunteers, but they may sometimes relate to the actions of a third party,

such as a customer, supplier or service provider. In some circumstances, the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or Whistleblowing Officer or one of the other individuals set out in Appendix 1 Raising a whistleblowing concern.

2.6 Protect and support for whistle-blowers

- 2.6.1 It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employees who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 2.6.2 Our Employee Assistance Programme (EAP) is a wellbeing and life management resource to support employees and their dependents manage life issues and stay well. No matter what the issues, problem or event, they are here to support you, 24 hours a day, in confidence and free of charge. EAP helpline - 24-hour Freephone Helpline 0800 1116 387, available 365 days a year.
- 2.6.3 Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 2.6.4 No employee must threaten or retaliate against whistle-blowers in any way. If an employee is involved in such conduct h/she may be subject to disciplinary action. In some cases, the whistle-blower could have a right to sue the individual personally for compensation in an employment tribunal.

3.0 Documentation

- 3.1 None identified at this time

4.0 Permissible exceptions

- 4.1 None identified at this time

5.0 Related Policies or Processes:

- OCEO-P-001 Whistleblowing Policy

- Grievance Procedure
- The Dignity at Work Policy
- OCEO-PR-002 The Investigation Procedure

6.0 Governance Information. Please do not remove.

Governance Review & Approval Table*:

The table below contains two rows and five columns.

Governance Area:	H&S	Safeguarding	Insurance	Legal	Data Protection
Date Approved:					

Review Frequency:

Procedures - Core: Annually

Procedures - Subject Specific: Every 2 years

Reviews should be done in accordance with relevant regulation, legislation changes or as a result of ad hoc activity, such as continuous improvement initiatives.

7.0 Version control table:

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

Date	Version	Status	Details of Change
16/02/18	V1.0	Approved	New document
26/9/23	V5.0	Updated	To update CEO and Auditor contact details. To update adjustments, recording, witness and available support information.

***Please see below when a document must be reviewed by Governance**

Safeguarding - All documents with any reference to safeguarding, recruitment and training, working with clients (Adult and CYP).

Legal - All documents with any reference to agreements or contracts, third party partnerships, potential reputational risk, reference to compliance with any statutory or regulatory obligation.

Health and Safety - All documents where an activity could cause harm to a member of staff, service user, volunteer or third party or where there is reputational risk.

Insurance - A change to the way we deliver our services.

Data Protection - If we are gathering any personal information on volunteers or service users.

8.0 Appendix:

8.1 Contact details

Whistleblowing Officer

Marianne Millard

Mobile: 07501 625061

speakoutatguidedogs@guidedogs.org.uk

CEO

Andrew Lennox

Mobile: 07771 377394

Andrew.lennox@guidedogs.org.uk

Head of Legal

Guy Perring

0118 983 8125

07957 135238

Guy.perring@guidedogs.org.uk

Chairman of the Risk Committee (Formerly Audit & Risk Committee)

Mark Johnstone

07720 508988

Mark.johnstone@guidedogs.org.uk

Safecall (confidential external reporting hotline)

Helpline: 0800 9151571

Report on line at: www.safecall.co.uk/report

Confidential Counselling Hotline

Employee Assistance Programme

0800 1116 387

<https://www.my-eap.com/>

External Auditors:

BDO

Fiona.condron@bdo.co.uk

Audit Partner

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