



#FBF696 trading as Norwich OUTPOST

Whistleblowing Policy and Procedure

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1. Purpose

The purpose of this document is to define our whistleblowing procedure to show the expression of commitment and good practice at Norwich OUTPOST (#FBF696). This is in relation to the 'Seven Principles of Public Life' identified by the 'Nolan Principles'. These seven principles include selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

2. Policy Statement

At Norwich OUTPOST (#FBF696) our whistleblowing policy is intended to provide a safe channel and process for individual employees to raise genuine and legitimate concerns. In turn we intend to deter serious malpractice at the earliest practicable stage, to avoid crisis management and public criticism and to promote accountability for individuals actions.

Due to there being no set definition of malpractice, this procedure covers serious possibilities of malpractice. The possibilities include fraud and financial irregularities, serious maladministration arising from the deliberate commission of improper conduct, unethical activities which may be of a criminal nature and dangerous acts or omissions which create a risk to health, safety and/or the environment.

The procedure is not to be used to raise grievances concerning personal employment or appeals against management decisions; such matters should be pursued through grievance or appeals procedure as appropriate. This policy also does not used to complain about mismanagement, except in relation to serious malpractice as set out above.

3. Policy Aims and Objectives

The purpose, aims and objectives of this policy are to encourage and provide a procedure for Norwich OUTPOST (#FBF696) steering committee members, board of trustees, volunteers and employees to raise and discuss genuine concerns which relate to serious malpractice.

4. Legal requirements

The Public Interest Disclosure Act 1998

The Public Interest Disclosure Act 1998 protects disclosures when there is reasonable belief from the individual making the disclosure that one or more of the

following has been, is being or is likely to be committed. They are protected by this act when the individual has followed the internal procedures to raise their concerns:

- a criminal offence or failure to comply with a legal obligation
- a miscarriage of justice
- risking the health and safety of any individual
- harming the environment
- that information showing any matter that falls within any one of the previous paragraphs has been, is being or is likely to be deliberately concealed.

5. Definition

At Norwich OUTPOST (#FBF696) we accept the following definition of whistleblowing:

"Whistleblowing is the disclosure by an employee of confidential information which relates to some danger, fraud or other illegal or unethical conduct within the workplace, be it of the employer or a fellow employee." - Lord Borrie Q.C.

This also includes acts made by Norwich OUTPOST (#FBF696) steering committee members, board of trustees and volunteers.

6. Scope

This Whistleblowing procedure applies to Norwich OUTPOST (#FBF696) steering committee members, board of trustees, volunteers, and employees.

7. Procedure for raising a concern

7.1 If you discover malpractice

If you have reasonable grounds for believing that malpractice is occurring in the organisation in relation to the type listed above you should raise it in confidence and, wherever possible, in writing to the Chair immediately and explain the situation to them. They will then arrange for an appropriate investigation to be carried out regarding the individual/s. If you suspect that the Chair themselves is involved in the malpractice you should contact OUTPOST trustees. Any reasonable concerns regarding malpractice should always be raised internally in the first instance.

7.2 **Communication regarding concern**

The Chair, or the individual responsible for dealing with the investigation will acknowledge receipt of your concern in writing within 3 days. This individual will keep you informed of the progress of the investigation and the concluding outcome, as far as is possible to do so. Any correspondence will be sent to your home address, or handed to you personally. Norwich OUTPOST (#FBF696) will try to resolve the matter as quickly as possible.

8. **Appeals**

The trustees and steering committee are responsible for considering the allegations in relation to the evidence from the investigation and to determine the appropriate course of action in relation to the case. If you happen to disagree with the final decision taken you should discuss the matter with the Chair of Norwich OUTPOST (#FBF696). If at this point you are still not satisfied, you may report it to Public Concern at Work (020 7404 6609) or the Charity Commission if the complaint is about activities regarding the registered charity. However, such a step would have serious implications for the charity and should only be taken after very careful and serious consideration. Under no circumstances should you talk to the press, radio or TV without the Chair's express permission.

8. **Confidentiality**

8.1 If you happen to raise a matter under this procedure it will be dealt with in the strictest confidence and your name, or details, will not be disclosed to the person against whom the allegation has been made - this will only be disclosed if you have given written consent, or IF there are grounds to believe that you have acted maliciously. In the absence of such consent or grounds we will not reveal your name except in these cases:

- If we are under a legal obligation to do so
- When the information is already in the public domain
- In a strictly confidential basis to the board of trustees or steering committee members for the time being if strictly necessary.
- In a strictly confidential basis to a professionally qualified lawyer for the purpose of obtaining legal advice regarding the situation.

Furthermore, any investigation that will be carried out will be done discreetly and the nature of the allegations and the name of those implicated will not be made public.

8.2 It is clearly established in law that the disclosure of confidential information in the public interest is a lawful act. You cannot therefore be disciplined or suffer detriment as a result of using this procedure, provided:

- you have followed the stages set down within it;
- you have acted in good faith and not for personal gain or out of personal (ie malicious or vexatious) motives.

9. Malicious accusations

If you use the Whistleblowing Procedure knowingly to make false or malicious accusations, you will be committing a disciplinary offence. Misuse of this procedure could constitute an act of gross misconduct and may lead to your dismissal as a Norwich OUTPOST (#FBF696) steering committee member, board of trustees, employee or volunteer.