Part of the Good Neighbours Network	**Alton Community Care** **Registered Charity No. 275617**

Whistleblowing Policy

Purpose

Alton Community Care (ACC) is committed to operating openly, honestly and responsibly. We encourage anyone involved with the organisation to raise genuine concerns about wrongdoing without fear of unfair treatment or retaliation.

This policy explains what whistleblowing means, the types of concerns that can be reported, how concerns should be raised, and how the organisation will respond.

We will take genuine concerns seriously and handle them as fairly, sensitively and confidentially as reasonably possible.

Scope

This policy applies to everyone involved with ACC, including but not limited to volunteers, trustees, committee members and clients.

The policy applies to concerns relating to ACC, its activities, finances, governance, people or the conduct of individuals acting on its behalf.

What is whistleblowing?

Whistleblowing occurs when someone raises a genuine concern about serious wrongdoing or a risk of wrongdoing connected with the organisation.

Whistleblowing is different from a personal grievance or complaint. A grievance will normally concern the individual's own treatment, whereas whistleblowing generally involves concerns about wrongdoing that affects other people, ACC, the public or the wider community.

Examples of matters that may be appropriate to raise under this policy include:

- Fraud, theft or financial misconduct
- Misuse or misappropriation of organisational funds
- Breaches of the organisation's financial controls
- Bribery or corruption
- Criminal activity
- Breaches of legal or regulatory requirements
- Safeguarding concerns
- Abuse, neglect or exploitation
- Health and safety risks
- Deliberate concealment of wrongdoing
- Conflicts of interest or abuse of position
- Manipulation or falsification of organisational records
- Breaches of governance requirements
- Conduct that could cause harm to individuals, ACC or the public
- Environmental wrongdoing
- Attempts to conceal any of the above

This list is not exhaustive.

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Good-faith concerns

You do not need to have proof that wrongdoing has occurred before raising a concern.

You should have a reasonable basis for believing that the information you are reporting indicates wrongdoing or a risk of wrongdoing.

A concern will not be treated as misconduct simply because an investigation concludes that the allegation cannot be substantiated, provided the concern was raised honestly and appropriately.

Personal grievances

Personal complaints about an individual's own volunteering arrangements, treatment, disagreements or other volunteer related matters should normally be raised under ACC's appropriate complaints, grievance, bullying and harassment, or volunteer management policies.

However, a concern may still fall under this policy where a personal grievance also involves wrongdoing, criminal conduct, safeguarding concerns, discrimination, or another matter of significant public or ACC interest.

If there is uncertainty about which procedure applies, ACC will help determine the appropriate route.

Who should receive a whistleblowing concern?

Concerns should normally be raised with:

Designated contact: Andrew Hinde (Chairman)
Email: chairman@altoncare.org.uk
Telephone: 07985 302720

Where the concern involves the designated contact, the concern should instead be reported to:

Alternative contact: Pauline Bacon (Chief Coordinator)
Email: chiefcoordinator@altoncare.org.uk
Telephone: 07973 315858

How to raise a concern

A concern may initially be raised verbally or in writing. A verbal report must immediately be followed up with a written report to provide a clear record.

Where possible, include:

- A description of the suspected wrongdoing
- What happened and when
- Where the incident or activity occurred
- The people involved
- Why you believe the behaviour or activity is concerning
- Any supporting evidence or documents
- The names of anyone who may be able to provide relevant information

You should not investigate the matter yourself or put yourself at risk to obtain evidence.

Anonymous concerns

Concerns may be raised anonymously.

However, anonymity can make it more difficult for ACC to investigate a concern, ask follow-up questions or provide feedback.

Where possible, we encourage people to identify themselves and will take reasonable steps to protect their identity.

Confidentiality

ACC will treat whistleblowing concerns sensitively and will keep information confidential as far as reasonably possible.

Information will only be shared with people who need to know to assess, investigate or respond to the concern.

There may be circumstances where ACC is required to disclose information, including where necessary to protect someone from harm, comply with legal requirements, involve an appropriate authority, or properly investigate the concern.

Where practicable, the person raising the concern will be informed if their identity needs to be disclosed.

Protection from retaliation

ACC will not tolerate bullying, harassment, victimisation or retaliation against anyone who raises a genuine concern under this policy.

Protection also applies, where appropriate, to people who assist with an investigation or provide information in good faith.

Anyone who believes they have experienced retaliation should report it immediately to the designated whistleblowing contact or alternative contact.

Handling a concern

When a concern is received, ACC will:

1. Acknowledge receipt where appropriate.
2. Consider whether the matter falls within this policy.
3. Assess whether any immediate action is necessary to protect people, property, funds or evidence.
4. Determine whether the matter should be investigated internally or referred to an appropriate external body.
5. Carry out an appropriate and proportionate investigation where required.
6. Keep appropriate records.
7. Take reasonable action based on the findings.

The person raising the concern may be asked for additional information.

External reporting

There may be circumstances where it is appropriate to report a concern directly to an external organisation or authority.

Depending on the nature of the concern, this could include the police, a regulator, safeguarding authorities, a relevant professional body, or another appropriate organisation.

Where ACC itself may be involved in the alleged wrongdoing, or where there is a serious risk that internal reporting would be inappropriate, concerns may need to be raised externally.

People considering external whistleblowing should seek appropriate independent advice about their circumstances and the protections available to them.

Safeguarding concerns

If a whistleblowing concern involves the abuse, neglect or exploitation of a child or adult at risk, the organisation's Safeguarding Policy must also be followed.

Safeguarding concerns will be prioritised and may need to be referred to the appropriate authorities without delay.

Safeguarding Lead: Pauline Bacon (Chief Coordinator)
Email: chiefcoordinator@altoncare.org.uk
Telephone: 07973 315858

Financial and charity-related concerns

ACC is a registered charity therefore concerns about financial misconduct, governance, safeguarding or other regulatory matters may need to be reported to the relevant charity regulator.

ACC will cooperate fully with any legitimate investigation by a regulator, law enforcement agency or other competent authority.

False or malicious reports

ACC recognises that genuine concerns may sometimes prove to be unfounded.

No action will be taken against someone simply because their concern cannot be substantiated, provided they raised it honestly and had reasonable grounds for doing so.

However, deliberately making a malicious, knowingly false or deliberately misleading report may be considered misconduct and may result in appropriate action.

Support for people raising concerns

Raising a whistleblowing concern can be difficult, particularly where the concern involves people the individual knows or works alongside.

ACC will, where reasonably possible:

- Treat concerns seriously and respectfully
- Keep the person informed about the process where appropriate
- Protect confidentiality as far as reasonably possible
- Take reasonable steps to protect people from retaliation
- Signpost individuals to appropriate independent advice or support where necessary

Records

ACC will maintain appropriate records of whistleblowing concerns, investigations and actions taken.

Records will be handled securely and in accordance with applicable data protection requirements.

Policy review

This policy will be reviewed regularly and whenever there are significant changes to legislation, regulatory guidance or organisational practice.

All trustees, volunteers, and relevant representatives will be made aware of this policy and how concerns can be raised.

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