



Whistleblowing Policy

Approved by: Board of Trustees

Date: February 2025

Last reviewed on: April 2024

Next review due by: April 2025

Purpose

We always aim to conduct ourselves ethically, and with honesty and integrity. We expect the same high standards from all of our people – participants, volunteers and employees.

We do, however, recognise that there may be occasions when we – or our people – do not get this right. In these instances, you may feel that you need to raise your genuine and serious concerns through this Whistleblowing Policy.

This Policy enables any stakeholder (participant, volunteer, employee) to inform management about any concerns they may have about serious malpractice, fraud, or corruption. These concerns can be initially raised in a safe and confidential environment and the information taken seriously.

Aims

- provide an effective way for you to raise serious concerns
- ensure that you receive feedback on any action undertaken by us as a result of you raising serious concerns
- ensure that you will be protected from reprisals or victimisation for having raised your concern in good faith
- signpost you to further options available to you if you are dissatisfied with our response, or if internal investigation is not appropriate
- allow the Warrington Wolves Community Foundation to take action against any employee who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so.

What is Whistleblowing?

‘Whistleblowing’ is defined as the ‘disclosure of information by an employee of confidential information relating to some danger, fraud or other illegal or unethical conduct connected with the workplace.’ It refers to the internal or external disclosure of malpractice as well as illegal acts, or omissions, at work. It covers, for example, how we raise funds, how we commission work or make payments.

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 and it provides protection for individuals who raise legitimate concerns about specified matters, outlined below. These are called qualifying disclosures. A qualifying disclosure is one made in good faith by an individual who has a reasonable belief that:

- a criminal offence (including fraudulent and corrupt behaviour, eg theft, fraud or malpractice)
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation, or
- concealment of any of the above.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed. You do, however, need to hold a reasonable belief of such an action having been, being or likely to be carried out. If you make such a protected disclosure, you have the right not to be dismissed, subjected to any other detriment, or victimised. This is the case even were it to materialise that you were genuinely mistaken. We will not tolerate any individual being subjected to a detriment as a result of their making a disclosure in good faith. Under the law, interns, contractors or volunteers, are not afforded the same legal protection that is afforded to employees. The Wolves Foundation want to promote and encourage an open and honest environment in which concerns can be freely raised. We will therefore, in so far as is possible, aim to treat all individuals making a disclosure in the spirit of the Public Interest Disclosure Act 1998.

Malicious disclosures

If it is found that you have maliciously raised a matter which you know to be untrue or you are involved in any way in the malpractice, wrongdoing or illegal acts or omissions, your behaviour may be addressed through the appropriate Warrington Wolves Community Foundation policies

Non-whistleblowing concerns

This policy is only to be used in the exceptional circumstances as outlined above. There are a number of Wolves Foundation policies that will be relevant in other circumstances. This list includes but is not limited to:

- safeguarding and protection of vulnerable adults
- disciplinary
- grievance

Raising a concern

You should raise your whistleblowing concern as soon as possible. This will make it easier to act and to enable any problems to be resolved or reported quickly. You can make your disclosure orally but written disclosures are preferable as these will make the process more efficient and effective. In your disclosure, you should:

- provide any relevant context and background, including relevant dates, venues, names etc
- state clearly the reason why the situation causes for concern

You must say that you are raising your concern using the Whistleblowing Policy and whether you wish your identity to be kept confidential. While we will make every effort to deal with your case confidentially, depending on the circumstances of the case this may not always be possible. Where this is the case, you will be informed of this and the reasons why it was not possible. We will consider anonymous disclosures, but we do not encourage them as anonymity often makes it difficult to properly investigate concerns, protect employees or give feedback on outcomes.

Who should I raise it with?

You should always look to raise the matter with your line manager in the first instance. Where this is not appropriate because they may be involved in the alleged malpractice, wrongdoing or illegal acts or omissions in some way, raise your concern with the CEO, Neil Kelly (neilkelly@warringtonwolvesfoundation.com). If a concern is about the CEO or a trustee, you should contact Alan Yates (alanyates@warringtonwolvesfoundation.com).

Confidentiality

Individuals who are concerned about possible reprisals have the option to remain anonymous by not revealing their identity when they disclose their allegations using this policy. Appropriate measures can be taken to preserve confidentiality of the information provided subject to external processes (such as criminal proceedings) where the release of information may be outside Warrington Wolves Community Foundation's control. If you are in doubt, you can seek advice from Protect, the independent whistleblowing charity. Contact details can be found here;

<https://protect-advice.org.uk/contact-protect-advice-line>

What happens after I raise a concern?

Your disclosure will always be acknowledged within 3 working days. It will be investigated by the CEO or nominated trustee. They will arrange to meet you as soon as possible, away from the workplace if necessary, to enable you to explain your concern.

You will be told either at the meeting or as soon as possible afterwards, what action will be taken to address the concern you have raised. Where action is not taken, you will be informed and given an explanation. The action taken in response to a disclosure will depend on the nature of the concern.

Typically, the matters raised may result in one or more of the following:

- no action required
- action being taken under other Wolves Foundation policy or procedure
- an internal investigation under this policy
- a referral to the police or relevant statutory body
- a referral to the Charity Commission
- an independent enquiry.

Raising a concern externally

We strongly encourage you to exhaust the internal processes set out above in the first instances. In exceptional or urgent circumstances, however, or where, having made a disclosure, you are unhappy with the outcome, you have a legal right to make a disclosure to prescribed bodies.

These include but are not limited to:

- the Charity Commission;
- HM Revenue & Customs
- the Health and Safety Executive;
- the Financial Services Authority;
- the Office of Fair Trading;
- Fundraising Regulator