



Camden Giving Whistleblowing Policy

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1. Purpose of this policy

1.1 We are committed to conducting our organisation activities, business and conduct with honesty and integrity. However, we recognise things may go wrong from time to time, and if they do we want to know so that we can address any wrongdoing fairly and effectively. This policy outlines the agreed procedure and actions in the event of Whistleblowing for staff and Trustees.

2. Definition

2.1 Whistleblowing is the disclosure of information which relates to suspected danger, fraud, illegal or unethical conduct in the workplace. The wrongdoing disclosed must be in the public interest, meaning it must affect others, for example the general public.

2.2 Whistle-blowers are workers who bring information about a wrongdoing to the attention of their employers or a relevant organisation, they are protected in certain circumstances under the Public Interest Disclosure Act 1998.

3. The Policy in Practice

3.1 We believe a culture of openness is essential in mitigating such situations occurring but we encourage members of staff to report any concerns about suspected wrongdoing if this occurs. We want all Camden Giving staff to be confident and comfortable about raising any matters of genuine concern without fear of reprisals, knowing their concerns will be taken seriously and that the matters will be investigated appropriately and regarded as confidential.

3.2 What types of concerns should I raise?

All individuals working at all levels in the organisation may raise concerns in accordance with this Policy, including Trustees, employees, casual workers staff and volunteers. Individuals are protected by law if they report any of the following:

- a criminal offence, for example fraud or financial mismanagement
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- failure to comply with legal or regulatory requirements law
- you believe someone is covering up wrongdoing
- bribery (as defined under the 'Gifts' policy).



- damage to the environment
- negligence
- unauthorised disclosure of confidential information
- breach of internal policies and procedures
- conduct likely to damage our reputation
- deliberate concealment of any of the above

Complaints that do not count as whistleblowing:

- Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public interest. In the case of personal grievances arising you must follow Camden Giving's grievance policy.

There is no detriment of disclosure as a Whistleblower. You will not be at risk of losing your job or suffering any form of retribution as a result, provided that:

- you reasonably believe that information, and any allegations contained in it, are substantially true; and
- you are not acting for personal gain.

3.3 Who should an individual raise a concern to?

We want you to speak up if you witness or experience any serious malpractice or wrongdoing at Camden Giving. Any disclosures should be made in good faith and where you have reasonable belief that the disclosure you are making is a serious risk or concern.

As soon as you become reasonably concerned you should first disclose the issue internally with your Director, Natasha Friend, in the first instance.

If your Director is the potential transgressor, you prefer not to raise it with them, you feel your Director has not addressed your concern or where the matter is more serious, you must escalate this to a representative of the Board of Trustees who is not affiliated with the incident, or who may potential conflict in the matter.

If worker feels unable to use the above procedures to raise the disclosure, they should contact a prescribed person or body so that employment rights are protected. We recommend you should exercise care and obtain independent legal advice before doing so. Guidance is available from [GOV.UK - Blowing the whistle: list of prescribed people and bodies](#)

If you do raise a concern under this Policy, you will not be at risk of losing your job or suffering any form of retribution as a result, provided that:

3.4 How does an individual raise a concern?

Initial concerns may be raised orally or in writing, but written records are a preference in order to move forward efficiently and effectively. To begin the process you should:

- state that you are using the Whistleblowing process
- specify if you wish for your identity to remain confidential
- provide the background and history of the concern (giving relevant dates);
- the reason why they are particularly concerned about the situation.
- you will be asked to formalise your concerns in writing which will be acknowledged and a record of further action will be kept
- you may be accompanied by a work colleague who will also be asked to respect the confidentiality if your disclosure and any subsequent investigation

4. Agreed Response

4.1 In the event of a suspected wrongdoing or danger raised to the Director Trustee, judgement should be applied as to the severity of the wrongdoing or danger and timely action may be critical depending on the nature of the concern.

4.2 The Director, Trustee or the prescribed person will:

- Handle disclosures promptly and fairly with due regard to the rights of all individuals involved.
- Invite you to a further meeting to discuss your concern.
- Listen to your concern to decide if any action or further investigation is needed. You may be asked for further information at this point.
- Review the information provided and decide whether to commence an investigation by themselves or a nominated individual or suggest a different way of handling the matter. If the latter course of action is adopted, the Director or Trustee will explain why, as well as how the whistleblower will be informed of the outcome that may be taken.
- This decision should be made and communicated to the whistleblower within 10 working days.
- If the investigation needs to proceed, a record of further action will be kept and stored securely and confidentially
- Keep you informed about the action they've taken and/or the outcome, where appropriate, including if a referral to an external investigative team has taken place. But they cannot give you much detail if they have to keep the confidence of other people.
- You will not have a say in how your concern is dealt with but if you have made a disclosure under the procedure and are not satisfied with the investigation or its conclusion you can contact another representative to look at your case, including another Board Member or external representative.

4.2 The Director, Trustee or prescribed person must not do any of the following:

- contact the suspected individual in an effort to determine facts or demand restitution; or



- discuss the case with anyone other than the people listed above who the concern is raised to, unless there is a valid reason to involve other individuals, organisations or bodies where public interest is at risk.

Any concern, problem or complaint relating to a member of staff's personal circumstances should be raised through Camden Giving's grievance procedures

4.3 The length and scope of investigation will depend on the subject matter. In most cases there will be an internal initial assessment to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on incorrect or incomplete information.

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

- no action required
- action being taken under other Camden Giving 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

If a longer investigation is required, and where this cannot be dealt with internally, we will seek to appoint an external investigator including people with experience of operating workplace procedures or specialist knowledge of the subject matter of the disclosure. If Camden Giving continues to investigate the concern and does not refer it elsewhere, the whistleblower will be kept informed of progress at least at four-week intervals.

Recommendations for change will also be invited from the investigative team to enable us to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered.

4.4 If a complaint comes to you and you are unsure how to deal with this, we recommend that you seek advice from an external reputable organisation such as www.whistleblowing.org.uk, GOV.UK, ACAS or Charity Commission.

The Director might be able to seek guidance from our HR Consultants, Bluestone HR, to advise on the next steps and actions.

5. Reporting

5.1 Camden Giving staff will review how well our arrangements are working in line with internal and external factors regularly and report back to Trustees if further reviews need to take place, including:

- The number of whistleblowing concerns raised
- Types of concern, the investigations and actions arising as a result
- Feedback from staff briefings, consultations or surveys



- Incidents that are known about but were not properly reported internally to the safeguarding lead, managers or trustees
- Incidents that people you work with reported outside your organisation before they told anyone inside the organisation