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|---------------------------|--|---------------------|-----------------|
| <b>Policy Title:</b>      | <b>Whistle Blowing</b>   |                     |                 |
| <b>Policy Code:</b>       | <b>ICP 12.5</b>  |                     |                 |
| <b>Cross Referencing:</b> | <b>QS The Protection of Children Standard<br/>Ofsted- Policy and Guidance for Whistleblowing</b> |                     |                 |
| <b>Authorised by:</b>     | <b>Mark Parker</b>   |                     |                 |
| <b>Date:</b>              | <b>Feb 2021</b>  | <b>Review Date:</b> | <b>Feb 2022</b> |

## 1.0 Principles:

- 1.0 Impact for Change is committed to the highest possible standards of openness, probity and accountability.
- 1.1 It is the responsibility **of all employees** to bring to bring to the attention of Senior Management any evidence of unacceptable practice.
- 1.2 Impact for Change expects all employees, whom have serious concerns about any aspect of an individuals's, group's or business practices to raise those concerns.
- 1.3 This guidance is clear that staff can do so without fear of victimisation, subsequent discrimination or disadvantage. It is intended to encourage and enable staff to raise serious concerns within Impact for Change rather than overlooking a problem or reporting it outside.

## 2.0 Definition:

- 2.1 "The disclosure by a person, usually an employee in a government agency or private enterprise, to the public or to those in authority, of mismanagement , corruption, illegality, or some other wrong doing".
- 2.2 The guidance applies to all those person's working directly or indirectly on behalf of Impact for Change.

## 3.0 Aims:

- 3.1 This guidance aims to:
- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice;
  - Provide a way for you to raise those concerns and to be told of any action taken;
  - Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;
  - Reassure you that you will be protected from possible reprisal or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

3.2 This guidance deals with concerns not coming within the Staff Complaints Procedure, for example:

- Conduct which is an offence or a breach of law;
- Disclosures related to miscarriages of justice;
- Health and safety risks, including risks to the public as well as other staff;
- Damage to the environment;
- The unauthorised use of funds;
- Possible fraud and corruption;
- Sexual or physical abuse of young people;
- Other unethical conduct.
- Quantifiable “gut feelings”. For example a series of behaviours that make you question a persons behaviour or intent.
- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the IMPACT FOR CHANGE subscribes to;
- Is against the IMPACT FOR CHANGE's policies;
- Falls below established standards of practice; or
- Amounts to improper conduct.

3.3 A concern could be one event or a series of events that in isolation would not warrant the whistle-blowing procedure however collectively they do.

#### **4.0 Safeguards:**

4.1 Impact for Change recognises that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to Impact for Change and those for whom you are providing a service i.e. the young people we care for.

4.2 Impact for Change will not accept the harassment, victimisation or bullying of any person who uses the Whistle Blowing Policy.

4.3 Any person found to be treating an employee in an inappropriate manner will be subject to disciplinary procedures.

4.4 Similarly, any employee found to be using the Whistle Blowing Policy in a manner it is not intended (i.e. deliberate false allegations) will also be subject to Disciplinary Procedures.

4.5 If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against you.

#### **5.0 Confidentiality:**

5.1 Any concern reported under this guidance will be treated confidentially; unless you agree, your identity will not be disclosed by Impact for Change in dealing with your concern.

5.2 In the event of a concern disclosing alleged criminal activity, you may be asked to help the police or other appropriate enforcement agency, similarly any allegations that requires



referral to LADO that will occur. In the event of disciplinary action taken by Impact for Change you may be asked to give evidence under the disciplinary procedure.

## **6.0 Anonymous Allegations:**

- 6.1 Impact for Change encourage a culture of openness and transparency, employees are encouraged to put their name to any allegations whenever possible.
- 6.2 Concerns expressed anonymously will be considered at the discretion of the Directors of Impact for Change.
- 6.3 In exercising this discretion the factors to be taken into account include:
  - The seriousness of the issues raised;
  - The credibility of the concern;
  - The likelihood of confirming the allegation from attributable sources.

## **7.0 Raising a Concern:**

- 7.1 Employees should raise concerns with the Registered Manager, unless the allegation relates to the practice of the Registered Manager. As a first step, you should normally raise concerns with your immediate line manager or their manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.



Company Number  
10170735

Concern raising the whistle blowing policy.

Employee ensures young person is safe.

Is concern related to Registered Manager?:

**8.0 Impact for Change Response:**

**Yes.**

**No.**

Employee contacts Designated Safeguarding Lead

Employee contacts Registered Manager.

Confirm safety of young person.

Within 1 working days.

Is concern significant enough to liaise with DSL?

Discussion with

Is allegation of serious enough concern to suspend member of staff

Within 2 working days.

Member of staff suspended without prejudice pending investigation.

Registered Manager leads investigation with consultation with DSL.

DSL leads any referral to LADO/MASH (who will take the lead and inform of next steps):

- Be investigated by management,
- or through the disciplinary process;
- Be referred to the police;
- Form the subject of an independent inquiry.

**Disciplinary/ Safeguarding policy implemented.**

Record made of concern with by person making allegation or by person receiving allegation. The record should include:  
The background and history of the concern and facts (giving relevant dates);

- The reason why you are particularly concerned about the situation.

**If meetings are required you can bring a work colleague or trade union representative with you.**

**Investigation to be completed within 5 working days.**

Person making allegation unhappy with outcome OR allegation is related to practice within Impact for Change, Contact:

- Ofsted's dedicated Whistleblowing Hotline (**0300 1233155**) was launched in April 2009. It is staffed from 8am to 6pm, Monday to Friday.

Whistleblowing disclosures can also be submitted to Ofsted by email to the Ofsted whistleblowing team (whistleblowing@ofsted.gov.uk) or by post to:

- WBHL Ofsted Piccadilly Gate Store Street Manchester M1 2WD Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

Person making allegation unhappy with outcome OR allegation is related to practice within Impact for Change, Contact:

- The Audit Commission (confidential reporting for suspected fraud);
- Your trade union;
- Your local Citizens Advice Bureau;
- Relevant professional bodies or regulatory organisations;
- The Ofsted whistleblowing hotline
- A relevant voluntary organisation;
- The police
- The Local Government Ombudsman
- Health & Safety Executive
- Public Concern at Work (registered charity)

Within 10 days Clare Leach will contact the person making the allegation to confirm:

- Acknowledging that the concern has been received;
- Indicating how the matter is to be dealt with;
- Giving an estimate of how long it will take to provide a final response, telling you whether any initial enquiries have been made;
- Telling you whether further investigations will take place and if not, why not.

**If allegation proves to be malicious.**

**Disciplinary/ Safeguarding policy implemented.**

**IMPACT FOR CHANGE AIM FOR HONESTY AND INTEGRITY, ALL ALLEGATIONS MADE IN GOOD FAITH WILL BE TREATED AS SUCH, WITH NO COMEBACK.**

**ALL THOSE WORKING ON BEHALF OF IMPACT FOR CHANGE SHOULD ASK THEMSELVES "IF THIS WAS MY LOVED ONE WHAT WOULD I EXPECT".**





## 9.0 Persons who may be contacted for Advice on making a Confidential Report:

| NAME                | CONTACT DETAILS  |
|---------------------|--|
| Mark Parker         | • 07842304059  |
| Clare Leach         | • 07958038624  |
| LADO                | • 01392 384964 (Devon)   |
| MASH                | • 0345 155 1071  |
| Independent Visitor |  |
| OFSTED              | • 0300 1233155<br>• <a href="mailto:whistleblowing@ofsted.gov.uk">whistleblowing@ofsted.gov.uk</a> |

Staff must ensure that they record all names of those that have been reported to and any actions that have been agreed.



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