



WHISTLEBLOWING POLICY

1. INTRODUCTION

Improving Lives Plymouth has a range of policies outlining standards of behaviour at work, including Diversity & Equality, Discipline, Grievance, and Harassment & Bullying. Staff and volunteers are encouraged to use these policies for personal grievances or workplace issues affecting them directly.

However, there may be times when a concern is not about you personally, for example:

- Dangerous practices
- Illegal activity
- Fraud, corruption, or malpractice

Raising such concerns helps the organisation improve and protect service users. Your concerns will be respected and taken seriously, even if they later turn out to be mistaken.

Commitment:

Improving Lives Plymouth is committed to creating a safe, open, and transparent culture, where staff and volunteers can raise concerns at the earliest opportunity without fear of reprisal. Any disclosure made in good faith will be treated fairly and confidentially.

2. STATEMENT OF INTENT

We will:

- Take all concerns seriously and investigate them objectively.
- Keep you informed of progress and provide feedback on outcomes.
- Ensure necessary action is taken to resolve validated concerns.
- Treat whistleblowing separately from the grievance procedure, though cross-references may occur.
- Provide support for staff and managers to raise and handle concerns appropriately.

3. SCOPE AND DEFINITIONS

3.1 Who this policy applies to:

All staff, volunteers, contractors, and former staff.

3.2 What is whistleblowing:

Whistleblowing is the act of passing on information about wrongdoing at work, where you reasonably believe you are acting in the public interest.

3.3 Categories of wrongdoing include:

- Criminal offences (e.g., fraud, theft, tax evasion)
- Breach of legal obligations
- Miscarriage of justice
- Danger to health and safety of any individual
- Damage to the environment
- Deliberate concealment of any of the above

3.4 Examples of wrongdoing:

- Unsafe working conditions
- Lack of or poor response to reported safety incidents
- Inadequate induction or training
- Suspected fraud
- Bullying culture (wider organisational/team level)
- Safeguarding concerns, bribery, or financial wrongdoing

3.5 Key points:

- You do not need proof; a reasonable belief is sufficient.
- You are not responsible for investigating the wrongdoing. The organisation will conduct any investigation.
- This policy is not for personal employment grievances; these should follow the grievance policy

4. LEGAL PROTECTION

Workers are protected under the Employment Rights Act 1996 (as amended) and the Public Interest Disclosure Act 1998 where they make a protected disclosure. Protection includes safeguarding against:

- Dismissal
- Victimisation or other detriment

Volunteers do not have the same statutory protection; however Improving Lives Plymouth will not tolerate reprisals against any volunteer who raises a concern in good faith.

External advice:

- **Protect:** <https://protect-advice.org.uk>, 020 3117 2520
- UNISON representatives or trade unions

ACAS: <https://www.acas.org.uk/whistleblowing-at-work>

5. ROLES AND RESPONSIBILITIES

5.1 Senior Management / Trustee Board:

- Demonstrate commitment to an open and learning culture
- Oversee policy implementation and annual reporting
- Appoint and support **designated contacts / whistleblowing contacts**
- Ensure appropriate action and organisational learning

5.2 Managers:

- Ensure staff awareness of the policy
- Investigate or escalate issues promptly
- Protect whistleblowers from detriment
- Foster open and psychologically safe culture in teams

5.3 Designated whistleblowing contacts:

- Senior staff trained to handle disclosures confidentially and impartially
- Provide advice and support to staff and managers
- Escalate concerns to senior management
- Monitor and report on whistleblowing activity
- Ensure learning from cases is shared

5.4 Trade Union Representatives:

- Support staff through the procedure
- Advise and guide staff on raising concerns

6. HOW TO RAISE YOUR CONCERNS

6.1 Internal reporting:

- Usually, raise concerns with your manager if appropriate.
- If the concern involves your manager or you are uncomfortable, report directly to a member of the senior management team.
- Disclosures should ideally be in writing (email/letter) including names, dates, locations, and reasons for concern.
- Staff may request confidentiality; this will be respected as far as practicable.

There may be circumstances where confidentiality cannot be maintained (for example where there is a safeguarding risk, criminal investigation, or legal obligation). We will discuss this with you wherever possible.

6.2 Anonymous reporting:

- Allowed but may limit the organisation's ability to investigate fully or provide feedback.

6.3 Meetings:

- You can be accompanied by a trade union representative.
- Meetings may take place off-site if requested.

6.4 Timelines:

- Acknowledgment of receipt: within 3 working days
- Updates: every 2–4 weeks, or as agreed
- Feedback following investigation: usually within one month

7. HOW IMPROVING LIVES PLYMOUTH WILL RESPOND

We will:

- Assess concerns promptly, including immediate action where there is risk to people or safeguarding issues.
- Appoint an investigator with appropriate independence.
- Conduct proportionate, evidence-based investigations.
- Record outcomes (e.g. upheld, partially upheld, not upheld, unable to conclude).
- Focus on resolution and organisational learning.
- If misconduct is identified, the Disciplinary Policy may apply.
- Personal data will be handled in accordance with UK GDPR.
- Feedback will be provided wherever possible, while respecting confidentiality.

If you are dissatisfied with how your concern is handled, you may escalate to senior management, trustees, or appropriate external bodies.

Where relevant, trustees may also consider whether a Serious Incident Report to the Charity Commission is required.

8. HARASSMENT AND VICTIMISATION

- Raising a concern cannot affect employment, promotion, or training opportunities.
- Retaliation, bullying, or harassment will not be tolerated and may result in disciplinary action, up to dismissal.
- Any detrimental treatment should be reported to a member of the senior management team
- Good-faith disclosures that turn out to be unsubstantiated will not result in disciplinary action.
- Deliberately false or malicious allegations may be treated as a disciplinary matter.

9. EXTERNAL REPORTING

If internal reporting is not appropriate or effective, staff can report to prescribed regulators or bodies, including:

- HM Revenue & Customs
- Comptroller and Auditor General
- Director of the Serious Fraud Office
- Charity Commission for England and Wales
- Information Commissioner
- Equality and Human Rights Commission
- Health and Safety Executive
- Care Quality Commission
- Environment Agency

Links:

- [List of prescribed bodies](#)
- Protect Advice Line: 020 3117 2520, <https://protect-advice.org.uk>
- ACAS Guidance: <https://www.acas.org.uk/whistleblowing-at-work>
- To retain legal protection, you must reasonably believe the information is substantially true and relevant to that body.

- Raising concerns via social media or the press is unlikely to be protected except in very limited circumstances — seek advice first.

10. SUPPORT AND TRAINING

- Staff can seek advice from trade unions, Protect, or our Employee Assistance Programme.
- Support is available for staff experiencing stress or anxiety as a result of raising a concern.

11. RECORD KEEPING AND MONITORING

- Records of disclosures, investigations, and outcomes will be kept securely in line with GDPR.
- Access is restricted to those directly involved in the investigation.
- Records will be retained for no longer than necessary.
- Annual reporting on whistleblowing activity will be provided to senior management/trustees to ensure transparency and learning.

12. POLICY REVIEW

- This policy will be reviewed annually or sooner if legal requirements change.
- Lessons learned from disclosures will be fed back to improve procedures and organisational practice.

SIGNED:



DATE:

February 2026

REVIEW DATE:

February 2027

Version Control/Change Log			
Version	Date	Author/s	Changes Made
1.0	February 2026	Lee Sewrey/Sarah Austin/Mathew Cunningham	Policy updated and expanded to align with current legislation and best practice; clarified definitions and scope; strengthened roles and governance; introduced clearer reporting and investigation processes, GDPR compliance, enhanced protections against victimisation, and added support, monitoring and review arrangements.