



Triple C
(Liverpool)

Christ Church Community Centre
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Liverpool
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WHISTLEBLOWING POLICY

What is Whistleblowing?

You're a whistleblower if you're a worker and you report certain types of wrongdoing. This will usually be something you've seen at work - though not always.

The wrongdoing you disclose must be in the public interest. This means it must affect others, eg the general public.

As a whistleblower you're protected by law - you shouldn't be treated unfairly or lose your job because you 'blow the whistle'.

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Complaints that count as whistleblowing

You're protected by law if you report any of the following:

- a criminal offence, eg fraud
- a miscarriage of justice
- the company is breaking the law, eg doesn't have the right insurance
- you believe someone is covering up wrongdoing
 - Conduct which is an offence or a breach of law.
 - Failure to comply with a legal obligation
 - Child protection *or safeguarding* issues
 - Disclosure related to miscarriages of justice.
 - Health and safety risks (including risks to the public) if reported and not acted upon
 - Damage to the environment
 - Unauthorised use of public funds
 - Possible fraud or corruption
 - Sexual, physical or other abuse of others
 - Other unethical conduct
 - Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong
 - Any attempt to prevent disclosure of the above

Complaints that don't count as whistleblowing

Personal grievances (eg bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

These should be reported these under Triple C Grievance and Appeal Policy.

Should I raise a concern?

Employees who are concerned about any malpractice but unsure whether to blow the whistle or to stay silent or are unclear about how to go about blowing the whistle may obtain free expert help from the independent charity Public Concern at Work see appendix for details.

Raising a concern

1. For employees, the first step is to raise any concern with their line manager.
2. If the employee feels that the concerns involve the line manager, they should speak to the Chair or Vice Chair of Trustees. The Board of Trustees should consider a designated Whistleblowing Trustee to deal with any concerns raised involving the Trustees.
3. When raising a concern, individuals should provide as much information as possible including
 - The background and history of the concern (including relevant dates, times, names, places, etc)
 - The nature of the concern
 - The reason why they are particularly concerned about the situation.
 - The names of any colleagues/employees who are considered to be either directly involved or who can help with further information.
 - Any other background information eg lists of documents, etc.
4. Whilst this is supportive, the whistleblower does not need to provide evidence for the employer to look into the concerns raised.
5. Concerns should be raised in writing.
6. All anonymous concerns will be treated seriously, however without contact details it may be difficult to clarify information, gain additional information or carry out an investigation.

How Triple C will respond

1. The action taken by Triple C will depend on the nature of the concern raised and will normally be investigated internally by the trustees. However, in appropriate cases the concerns may be referred to the local authority, a regulatory body or the Police in criminal matters.
2. In order to protect the whistleblower, Triple C and those accused, initial enquiries will be made to decide whether an investigation is appropriate, and if so, what form it should take, and who should conduct it.
3. Concerns which fall within the scope of other procedures will normally be referred for consideration under those procedures.
4. The overriding principle which Triple C will have in mind is the public interest.
5. Triple C has a commitment to take all reasonable steps to maintain the confidentiality of the whistleblower where it is requested (unless required by law to break that confidentiality)
6. Concerns may be resolved by agreed action without the need for an investigation. If urgent action is required, this will be taken before any investigation is conducted.
7. Where the individual raising the concern has provided contact details the person receiving the concern will send an acknowledgement within 15 working days. If it is possible to say at this stage how the matter is to be dealt with, then more information may be provided,

however since investigations often involve maintaining confidentiality, it may not be possible to disclose any further information.

8. If an investigation is to be undertaken an appropriate investigating officer will be appointed, which may be the person who received the concern. Where the individual has provided contact details, an investigation interview should be undertaken unless not required by the whistleblower. The investigating officer will meet with the individual to gather as much information as possible. Where the complainant is an employee, they will be entitled to representation by a colleague. The investigating officer will inform the individual what steps will be taken and potential timescales for the investigation to be completed. If the matter does not fall under the whistleblowing policy, they will be informed how the matter will be taken forward.
9. Employees who are the subject of a whistleblowing concern which is being investigated, may be contacted by the Investigating Officer and a formal investigation will be carried out and the employee has a right to representation by a colleague. This is to ensure that the investigation is fair and open. The details of any concerns raised which are discovered to be untrue will not be kept on the employee's file.
10. The investigating officer will consider all the evidence and make a recommendation to the Board of Trustees. In the case of financial irregularities, a report of the findings will be sent to the Charity Commission and Companies House.
11. Triple C accepts that those raising concerns need to be assured that the matter has been properly addressed, therefore subject to legal constraints, information will be provided on the outcome of any investigation, to the whistleblower, as long as contact details have been provided.
12. If an individual feels that it is right to take the matter further they may refer to the table provided at the end of this section, which provides details of a number of relevant organisations.

Merseyside Police	Merseyside Police HQ Canning Place Liverpool LI 8JX 101 (for calls from Merseyside) or 0151 709 6010 (from outside Merseyside)
The Environment Agency	National Customer Contact Centre PO Box 544 Rotherham S60 1BY 03708 506 506 enquiries@environment-agency.gov.uk
Health and Safety Executive	Redgrave Court Merton Road Bootle L20 7HS 0151 951 4000

HM Customs and Excise	<p>Customs Confidential Freeport SEA 939 PO Box 100 Gravesend, Kent DA12 2BR 0800 595 000</p>
Public Concern at Work	<p>Public Concern at Work 3rd Floor Bank Chambers 6-10 Borough High Street London SE1 9QQ 020 7404 6609 whistle@pcaw.org.uk</p>
The Charities Commission	<p>whistleblowing@charitycommission.gsi.gov.uk Use this service if you are a paid charity employee or adviser and you want to report suspected wrongdoing in the organisation you work for. Guidance 'Whistleblowing: guidance for charity employees' (https://www.gov.uk/guidance/whistleblowing-guidance-for-charity-employees) 0300 066 9197 (9am to midday, Monday to Friday, except national holidays)</p>
Diocese of Liverpool	<p>St James' House 20 St James' Road Liverpool LI 7BY 0151 709 9722</p>

Policy Adopted: July 2007 Most recent review: November 2016