



# Whistleblowing policy

All employees at North Star Community Trust  
("The Trust")

July 2024

## 1. Scope and purpose

- 1.1. The Trust is committed to conducting itself with honesty and integrity, and it expects all staff to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.
- 1.2. The aims of this policy are:
  - 1.2.1. to encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
  - 1.2.2. to provide staff with guidance as to how to raise those concerns; and
  - 1.2.3. to reassure staff that they should be able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken.
  - 1.2.4. This policy does not form part of any employee's contract of employment and it may be amended at any time.

## 2. Who is responsible for the policy?

- 2.1. The Trust has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- 2.2. The Whistleblowing Officer has day-to-day operational responsibility for this policy, and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- 2.3. All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

## 3. Who is covered by this policy?

- 3.1. This policy applies to all individuals working at all levels of the Trust, including officers, directors, employees, consultants, contractors, trainees, homeworkers,

part-time and fixed-term workers, casual and agency staff and volunteers (collectively referred to as staff in this policy).

- 3.2. This policy is provided to all new staff as part of the Trust's Induction process. All staff are required to sign a declaration to confirm that they have read and understood this policy and who they can approach to report a concern.

## 4. What is whistleblowing?

- 4.1. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include: -
  - 4.1.1. criminal activity;
  - 4.1.2. miscarriages of justice;
  - 4.1.3. danger to health and safety;
  - 4.1.4. damage to the environment;
  - 4.1.5. failure to comply with any legal or professional obligation or regulatory requirements;
  - 4.1.6. bribery;
  - 4.1.7. financial fraud or mismanagement;
  - 4.1.8. negligence;
  - 4.1.9. breach of the Trust's internal policies and procedures;
  - 4.1.10. conduct likely to damage the Trust's reputation;
  - 4.1.11. unauthorised disclosure of confidential information;
  - 4.1.12. concerns about the harm or risk of harm to children;
  - 4.1.13. the deliberate concealment of any of the above matters.
- 4.2. A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or

danger affecting any of the Trust's activities (a whistleblowing concern) you should report it under this policy.

- 4.3. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Trust's Grievance Policy or Anti-Harassment and Bullying Policy as appropriate.
- 4.4. If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

## 5. Raising a whistleblowing concern

- 5.1. If you have a whistleblowing concern, you should generally raise this with your manager in the first instance. You can do so either in person or in writing
- 5.2. Your manager may be able to resolve your concern. If they cannot quickly and effectively resolve your concern, or if your concern is of a serious nature, your manager will refer the matter to the Whistleblowing Officer
- 5.3. If your concern is of a serious nature, or if you feel that your manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer directly

## 6. Confidentiality

- 6.1. The Trust hope that staff will feel able to voice whistleblowing concerns openly under this policy.
- 6.2. The Trust does not encourage staff to make disclosures anonymously. A proper investigation may be more difficult or impossible if it cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.
- 6.3. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to protect your identity. If you are in any doubt you can seek advice from **Protect**, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

## 7. Investigation and outcome

- 7.1. Once you have raised a concern, the Trust will carry out an initial assessment to determine the scope of any investigation. The Trust will inform you of the outcome of its investigation although this is not always appropriate or possible. You may be required to attend additional meetings in order to provide further information.
- 7.2. In some cases, the Trust may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable the Trust to minimise the risk of future wrongdoing.
- 7.3. The Trust will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the Trust giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 7.4. If the Trust conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

## 8. If you are not satisfied

- 8.1. While the Trust cannot always guarantee the outcome you are seeking, it will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help the Trust to achieve this.
- 8.2. If you are not happy with the way in which your concern has been handled, you can raise it with one of the Trustees.  
[www.northstartrust.org.uk/board-of-trustees](http://www.northstartrust.org.uk/board-of-trustees)

## 9. External disclosures

- 9.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.
- 9.2. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if

ever be appropriate to alert the media. The Trust strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, **Protect**, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

- 9.3. Whistleblowing concerns usually relate to the conduct of the Trust's staff, but they may sometimes relate to the actions of a third party, such as a supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, the Trust encourages you to report such concerns internally first. You should contact your line manager, a member of the Senior Management Team or the Whistleblowing Officer for guidance.

## 10. Protection and support for whistleblowers

- 10.1. It is understandable that whistleblowers are sometimes worried about possible repercussions. The Trust aims to encourage openness and will support staff who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 10.2. Staff must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using the Trust's Grievance Procedure.
- 10.3. Staff must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.
- 10.4. Acting as a companion to attend any meetings under this policy is voluntary and colleagues are under no obligation to do so however they must respect the confidentiality of your disclosure and any subsequent investigation should it occur.
- 10.5. Companions are allowed reasonable time off from duties (without loss of pay) to attend meetings.

## 11. Contacts

<b>North Star Community Trust</b> <b>Whistleblowing officer</b>	HR Manager Landline e-mail	Eneyo Ilenbaremen <b>020 8843 0708 (Ext 692)</b> <a href="mailto:eilenbaremen@northstartrust.org.uk">eilenbaremen@northstartrust.org.uk</a>
<b>Protect</b> <i>Independent whistleblowing charity</i>	Helpline: website:	(020) 31172520 <a href="http://www.protect-advice.org.uk">www.protect-advice.org.uk</a>