

## 13. Whistleblowing Policy

### Policy statement

ACT understands that sometimes things go wrong. If things do go wrong, then we ask you to tell us. Whistleblowing occurs when an ACT staff member raises a concern about misconduct, illegal or underhand practices by individuals and/or an organisation; and in as far as safeguarding goes - about the way care and support is being provided, such as practices that cause harm, or the risk of harm to others, or are abusive, discriminatory or exploitative. Officially this is called **making a disclosure in the public interest**.

This policy would also include situations where a staff member's concerns are not acted upon in accordance with the **Dealing with Allegations of Abuse made against Staff Procedure**, **Dealing with Allegations of Child on Child Abuse Policy** and/or the **Procedure for Responding to, Recording & Reporting Actual or Suspected Adult Abuse** as outlined in this **Safeguarding Handbook**.

### Purpose of having a Whistleblowing Policy

The purpose of this **Whistleblowing Policy** is to make it clear that ACT staff can whistleblow without fear of victimisation, subsequent discrimination or disadvantage. This **Whistleblowing Policy** is therefore intended to **encourage and enable** everyone to raise serious concerns directly to ACT, rather than overlooking a problem, or seeking a resolution of the problem outside of the organisation without first bringing the matter to the attention of ACT.

All ACT staff have a responsibility to maintain the highest standards of care towards everyone they come into contact with through their work with and for the organisation. This Whistleblowing Policy aims to ensure that serious concerns can be properly raised and addressed within the organisation and are recognised as a way of enabling the delivery of good practice - and which will help to ensure the protection of every child and adult at risk.

### Responsibilities

ACT believes that all staff are professional and skilful in the work and tasks they undertake. However, occasionally it may be that a staff member has concerns about another person's conduct or standards of practice e.g. they may be worried that a child is not being cared for properly; an adult at risk is being abused; or even that someone may be at serious risk. It could be that they have concerns about fraud; financial irregularity; or other issues they have become aware of within while working for ACT. All ACT staff have a responsibility to raise any such concerns so that they can be resolved.

ACT acknowledges that raising concerns can be an extremely difficult and courageous thing to do. Any ACT staff member who has good grounds on which to base their concerns - even if they do not have proof - will be listened to and taken seriously. Please remember though, that it is not your responsibility to investigate the matter - this is ACT's responsibility.

### Never keep quiet about wrongdoing

ACT staff members - who do not report bad practice or abuse, neglect or ill treatment of a child, young person or adult - or for that matter anything else illegal that they are suspicious about - may be seen as colluding with that unacceptable practice.

Such collusion constitutes a disciplinary offence and will be dealt with in accordance with ACT's **Disciplinary Procedure** (for staff) and **Resolving Problems with Volunteers Procedure** (for volunteers) and which could result in the termination of the working relationship - as well as the information being forwarded to the appropriate authorities.

**Reviewed & Updated: April 2023**

ACT will review this **Whistleblowing Policy** and best practice at least annually. In addition, more frequent reviews will be undertaken following a change in safeguarding legislation; following the implementation of a new activity or service which involves contact with children and/or adults at risk; following a safeguarding incident within the CCO (or one which directly concerns or affects the CCO); and/or following a significant organisational change.

## 14. Whistleblowing Procedure

### Procedure for Raising Concerns

#### 1. Speak to someone

In most circumstances, staff wishing to raise their concerns should ideally discuss the matter with their line manager. If this is not possible, perhaps because this person is thought to be involved or colluding in the suspected wrongdoing, another ACT manager or ACT's **DSO** or **SSM** should be contacted instead.

The person that the staff member raises their concerns to, will be responsible for ensuring the concerns are looked into or passed to the most appropriate person within ACT - in line with the organisations **Disclosures in the Public Interest Policy** contained within the **Employee Handbook**.

#### 2. Follow-up

Depending on the nature of the concern raised, a response regarding the action taken will be supplied to the staff member raising it as soon as possible. However, it is important to be aware that it might not always be appropriate to reveal the full extent of the investigation, where this relates to personal issues involving a third party.

#### 3. Conclusion

Once ACT's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff. If no action is to be taken, the reasons for this will be explained.

#### What to do if you're still concerned

If, on conclusion of the above stages, the individual making the disclosure reasonably believe that appropriate action has not been taken, then they may then report the matter externally to the proper authority in accordance with the provisions of the Act. **The Act sets out a number of prescribed external bodies or persons to which qualifying disclosures may be made as follows:**

[Click Here to Report a Concern](#)

**Notwithstanding the above, ACT always encourages staff to raise concerns internally in the first instance, rather than externally. This enables issues to be dealt with promptly and speedily.**

#### False and/or malicious allegations

No ACT staff member will ever be penalised for whistleblowing - even if it is not upheld - unless they made a false accusation which they knew was both untrue and made with malice. If it is found that a false accusation was knowingly made, this would be treated as gross misconduct in accordance with the ACT's disciplinary procedure (for staff) and resolving problems with volunteer's procedure (for volunteers) and could result in the termination of the working relationship.

**Reviewed & Updated: April 2023**

ACT will review this **Whistleblowing Procedure** and best practice at least annually. In addition, more frequent reviews will be undertaken following a change in safeguarding legislation; following the implementation of a new activity or service which involves contact with children and/or adults at risk; following a safeguarding incident within the CCO (or one which directly concerns or affects the CCO); and/or following a significant organisational change.