



reconstruct

Whistleblowing Policy & Procedure

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Policy Statement

This policy reflects the company's values and commitment to perform all business with honesty and integrity and the expectation upon all those who represent it to maintain high standards. We recognise that, as for all organisations, there is risk of things going wrong from time to time, perhaps including unknowingly harbouring unethical or illegal conduct.

This policy outlines the company's commitment to encouraging all who work on our behalf and service users, to raise any concerns about possible wrongdoing within the company so that this may be addressed and rectified as necessary. Assurance is given that a whistle-blower may raise any matter without fear of reprisal.

Purpose/Objectives

This Policy aims to:

- Encourage staff, associates, or volunteers to feel confident and supported in raising concerns;
- Provide guidance on when and how to do so;
- Reassure staff and volunteers that their concerns will be listened to, logged and taken seriously;
- Ensure you are aware of how to pursue further action if you are not satisfied with an investigation or response;
- Reassure staff, associates or volunteers that they will be protected from reprisals or victimisation as a result of a disclosure they make in good faith.

Scope

This policy applies to all who undertake work on behalf of the Company. This includes directors, employees, self-employed contractors, casual workers, agency workers, and partners in delivering services.

Policy Details

The notion of "whistleblowing" is underpinned by legislation (UK and international) which derives from concerns for high standards in public life and the delivery of services to the public, whether through public, private or voluntary enterprise. In particular, this policy takes account of the *Whistleblowing Arrangements Code of Practice* issued by the British Standards Institute and Public Concern at Work. The policy does not form part of any employee's contract of employment and it may be amended at any time.

It is understandable that whistle-blowers may be worried about possible repercussions of their actions. Accordingly, law and good practice recognise that workers must not suffer any detrimental treatment as a result of raising a concern; either from the company itself (i.e. managers), or other persons connected (i.e. other company workers/agents). 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 in

response to raising a concern you should inform a “whistleblowing officer” and if it is not remedied you should raise it formally using the company grievance or complaints procedure. Persons found to have threatened/retaliated against a whistleblower may be subject to disciplinary action.

This policy should not be used for dealing with individuals’ personal grievances about terms and conditions and/or individual treatment as an employee or agent of the company; nor for the handling of complaints from customers/stakeholders about performance of service delivery (or non- delivery) or service quality. The company’s grievance and/or complaints policies and procedures are the usual vehicles for such matters. However, if you are uncertain about the appropriate procedure to use, advice can be obtained from the main whistleblowing officers.

Responsibilities for Implementation of this Policy

The Director of the service is responsible for the cascading and communication of this policy. The policy will be cascaded and communicated in the following ways:

- E-mail communication to all Senior Managers for cascading

The Director is responsible for ensuring that the company has an effective procedure in place to achieve this policy, which is compliant with the relevant legislation and regulation pertaining to their company.

Definitions and Abbreviations

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This could include:

- a) Criminal activity
- b) miscarriages of justice
- c) danger to health and safety
- d) damage to the environment
- e) failure to comply with any legal or professional obligation or regulatory requirements
- f) bribery
- g) breach of company policies or procedures
- h) Conduct likely to damage the company’s reputation
- i) Unauthorised disclosure of confidential information
- j) Misuse of the company’s funds or resources
- k) Deliberate concealment of any or all of the above

A whistle-blower is a person who raises a genuine concern relating to any of the above and such concerns should be reported using this policy.

Procedure

You should raise your whistleblowing concern as soon as possible. This will make it easier to act and to enable any problems to be resolved or reported quickly.

You can make your disclosure orally but written disclosures are preferable as these will make the process more efficient and effective. In your disclosure, you should:

- provide any relevant context and background, including relevant dates, venues and names.
- state clearly the reason why the situation causes for concern.

You must say that you are raising your concern using the whistleblowing policy and whether you wish your identity to be kept confidential. While we will make every effort to deal with your case confidentially, depending on the circumstances of the case this may not always be possible. Where this is the case, you will be informed of this and the reasons why it was not possible. We will consider anonymous disclosures, but we do not encourage them as anonymity often makes it difficult to properly investigate concerns, protect employees or give feedback on outcomes.

Information which is reasonably believed to show one or more of the above should promptly be disclosed to the Children's Services Manager so that any appropriate action can be taken. Staff, freelancers or volunteers must use this procedure regardless of the status or position of those involved.

If the concern does not relate to their line manager/coordinator then in the first instance they must share the concern with them.

If the concern does relate to the line manager or if the line manager is unavailable, they must report to the Children's Services Manager, Leanne McGowan leanne.mcgowan@reconstruct.co.uk

If the concern is regarding the Children's Services Manager it must be reported to Siobhan Harper (Director) Siobhan.harper@Reconstruct.co.uk

If the concern is regarding to Siobhan Harper, it must be reported to HR, hr@reconstruct.co.uk to review and find an appropriate Leader to hear the complaint.

In any case of an incident that involves a local authority customer it must be reported in the first instance to the Children's Services Manager. They will then consider their own whistle blowing policy and any action taken by us as a consequence must satisfy their, and our, policy wherever possible.

Employees will suffer no detriment of any sort for making such a disclosure in accordance with this procedure.

Whistle-blowers will not be penalised in any way. Whistleblowing is considered a vital safeguarding tool. It is a disciplinary matter to victimise a bona fide whistle-blower.

What happens after I raise a concern?

- Your disclosure will be answered in 2 working days.
- It will be investigated by the Service Manager or the person you raised the concern too. If the disclosure is with regards to the service manager it will be investigate by a senior group role i.e. CEO.
- A meeting will be arranged as soon as possible in a suitable location to discuss this matter or via Teams.
- The length of the investigation will be based on the concerns raised, however will be no longer than 30 days from the initial meeting.
- All information passed on will be treated confidentially whilst it is investigated.

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Version	Revision Date	Section Revised	Person undertaking Revision	Reason for Revision
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