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Whistleblowing Policy	Supersedes: June 2008

Whistleblowing Policy

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1. Policy statement

- 1.1 Two Saints encourages a free and open culture in dealings between management, employees, workers and volunteers as part of its commitment to openness, accountability, equality and diversity. We wish to enable employees, clients and anyone with whom we engage in business to come forward and inform us of any serious concerns about any aspect of our work or business practice.
- 1.2 In most cases it should be possible to deal with concerns or complaints through our normal grievance, disciplinary and client complaint procedures. However, we acknowledge that in exceptional circumstances an employee, client or Board Member may need to come forward on a confidential basis. It is also acknowledged that there may be occasions when an external stakeholder or someone working for another organisation wishes to raise a concern.
- 1.3 Whilst we hope that it will never be necessary for such action to be taken, this statement and the associated procedures are intended to underline our support and commitment to any person who feels that such action is necessary. Anybody raising a genuine concern in good faith will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns.

2. Procedure

- 2.1 This policy will apply in cases where an individual with concerns genuinely and in good faith believes that one of the following sets of circumstances is occurring, has occurred or may occur within the organisation, that:
- a criminal offence has been committed, is being committed or is likely to be committed
 - a person has failed, is failing or is likely to fail to comply with any legal or moral obligation to which he or she is subject
 - a miscarriage of justice has occurred, is occurring or is likely to occur
 - the health and safety of any individual has been, is being or is likely to be endangered (including bullying, harassment, victimisation, discrimination, abuse or neglect)
 - the environment has been, is being or is likely to be damaged
 - information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.
- 2.2 It is not necessary that employees, clients or external contacts prove the breach or failure that they are alleging has occurred or is likely to occur, but may simply raise a reasonable suspicion. However, they should note that they will not be protected from the consequences of making such a disclosure if, by doing so, they commit a criminal offence or if they make the disclosure motivated by a reason which is not in good faith.

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- 2.3 A person who wishes to raise or discuss any issues which might fall into the above category should contact the Chief Executive or, in their absence or in any other circumstances the Finance, Operations or HR Director, or a Board member, who will treat the matter in confidence wherever possible, however, confidentiality cannot be guaranteed in cases where statutory duties to disclose apply. In such cases it is likely that further investigation will be necessary and employees may be required to attend a disciplinary or investigative hearing as a witness. These will be carried out with due care and disclosed only on a need to know basis. Appropriate steps will be taken to ensure that the working environment and/or working relationship is/are not prejudiced by the fact of the disclosure.
- 2.4 If employees reasonably believe that the relevant failure (i.e. one of the set of circumstances listed above under clause (2.1) relates wholly or mainly to the conduct of a person other than their employer, then they should make that disclosure to Two Saints who will then take the appropriate steps with the other employer.
- 2.5 Also, employees may make such a disclosure to [Public Concern at Work](#), the leading authority on public interest whistleblowing, if they consider that it has an interest in the matter and, despite the best efforts of the organisation, employees believe that disclosure within the organisation is inappropriate or has been unsuccessful. Disclosures made to employees' legal advisors in the course of obtaining legal advice will be protected.
- 2.6 Employees should be aware that the policy will apply where a disclosure is made in good faith and where they reasonably believe that the information disclosed and any allegation contained in it are substantially true. If any disclosure is made in bad faith (for instance, in order to cause disruption within the organisation), or concerns information which employees do not substantially believe is true, or indeed if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence for the purposes of the organisation's Disciplinary Policy and Procedures and may constitute gross misconduct for which summary dismissal is the sanction.
- 2.7 While the organisation hopes that such disclosures will never be necessary within its organisation, it also recognises that it may find itself in such circumstances. Each case will be treated on the facts presented and elicited.

3. Reporting in confidence

- 3.1 Reporting a concern is never easy, particularly one which may involve corruption or fraud. Nonetheless if you feel something is not right, we would urge you to come forward sooner rather than later. Problems tend to become much more serious the longer they are left.
- 3.2 You should be prepared to put your concern in writing. You may be accompanied by a colleague or friend for support where you present your concerns in person if you prefer.

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- 3.3 If you come forward with a concern, you can be confident that this will not affect your career or your access to Two Saints' services and you can be sure of the organisation's support. Any attempt to discourage you from coming forward will be regarded as a disciplinary matter as will reprisals or victimisation afterwards.
- 3.4 If you ask for the matter to be treated confidentially, we will respect your request. Complaints will always be taken seriously and will be dealt with in the strictest confidence wherever possible, however, confidentiality cannot be guaranteed in cases where statutory duties to disclose apply. Positive action will be taken to prevent a re-occurrence of unacceptable behaviour by anyone, whether employed by Two Saints or not.

4. Who do you tell?

- 4.1 In normal circumstances you should be able to raise any concerns with your line manager or, in the case of clients, the manager of the service providing you with a service. However, in exceptional circumstances this may not be possible and you should go to a more senior manager or directly to the HR Director, Finance Director, Operations Director or the Chief Executive and ask for a confidential meeting. Concerned individuals who do not work for the organisation should contact the Chief Executive at the address below.
- 4.2 In extreme cases it may be necessary to contact the Chair of the Board or even someone outside the organisation. The following examples provide some guidance:
- 4.3 If the problem involves any of the above Directors or the Chief Executive - contact the Chair (c/o 35 Waterside Gardens, Fareham, Hampshire, PO16 8SD - mark your letter: confidential, addressee only).
- In the case of a criminal offence - contact the police.
 - In cases of fraud or abuse of public funds - contact the organisation's internal auditor TIAA Ltd.,(54-56 Gosport Business Centre, Aerodrome Road, Gosport PO13 0FQ) or the Tenant Services Authority, Maple House, 149 Tottenham Court Road, London W1T 7BN.
 - You can also approach Public Concern at Work for confidential and independent advice - Suite 306, 16 Baldwin's Gardens, London EC1N 7RG - Tel: 0207 404 6609 - Fax: 0207 404 6576 - e-mail: Whistle@pcaw.co.uk
 - Further confidential advice and support is available from the HR team on 01329 234600, the Employee Assistance Helpline on 0800 1699952 and your Dignity at Work Adviser.

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5. What will happen?

- 5.1 Any concern you raise with us will be taken seriously and investigated thoroughly. You will appreciate that we have to be fair to all concerned if others are involved and if someone is accused of misconduct, we will have to hear their side of the story. We will of course be mindful of any concerns you have expressed with regard to your own safety, your career, or your continued access to services. Two Saints' response to claims will vary depending on the circumstances, but will always be impartial, and will include the use of external bodies where necessary to ensure this.
- 5.2 We will endeavour to keep you informed as to the progress of any investigation and of any proposed action although we must respect the confidentiality of any others involved.
- 5.3 Any abuse of the confidential reporting process such as the malicious raising of unfounded allegations will be treated as a serious disciplinary matter - but there is nothing to fear if the concern is raised in good faith.

6. Review of policy

- 6.1 This policy will be reviewed at least every three years by the HR Director to ensure it remains effective in supporting the organisation's aims to have a free and open culture in terms of raising concerns and issues.

Other related policy and procedure:

You may find it useful to also read the following related policies:

Equal & Diversity Policy

Fraud Policy

Code of Conduct

Dignity at Work Policy and Procedure

Other related documentation

Client Complaint Procedure