



Volunteers' Disclosure of Malpractice in the Workplace (Whistleblowing) policy

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Contents

1. INTRODUCTION	3
2. WHAT IS WHISTLEBLOWING?	3
3. RAISING A WHISTLEBLOWING CONCERN.....	4
4. CONFIDENTIALITY.....	4
5. EXTERNAL DISCLOSURES	4
6. INVESTIGATION AND OUTCOME.....	5
7. PROTECTION AND SUPPORT FOR WHISTLEBLOWING	5
8. RESPONSIBILITY FOR THE POLICY.....	6
9. POLICY STATUS.....	6
10. IMPLEMENTATION OF POLICY.....	6

Volunteers' Disclosure of Malpractice in the Workplace (Whistleblowing) Policy

Group Hug aims to develop a culture of openness. As part of this, it is fundamental any concerns you may have about suspected malpractice within Group Hug, are raised. It is in everyone's interest to ensure that malpractice does not occur, by anyone, to anyone or in any practice.

The following policy and procedure explain what is meant by malpractice and how genuine concerns should be raised. Anyone who feels they need to raise a concern under this policy should note that Group Hug will take seriously any concerns raised and take all possible steps to ensure the person raising the concern is treated fairly, with dignity and respect.

1. INTRODUCTION

This policy applies to all volunteers of Group Hug.

2. WHAT IS WHISTLEBLOWING?

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

- criminal activity
- miscarriages of justice
- creating a risk to health and safety
- damage to the environment
- failure to comply with any legal obligation or regulatory requirement
- bribery
- financial fraud or mismanagement
- conduct likely to damage the reputation of Group Hug
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above

A whistle-blower is a person who raises a genuine concern in good faith relating to any to the above. If a volunteer has a genuine concern related to suspected wrongdoing or danger affecting any of our activities a report should be made under this policy.

This policy should not be used for complaints relating to the administration or carrying out of Group Hug's Social Enterprise activities, where there is no genuine concern in relation to wrongdoing or danger. In these cases, a report should be made using the Complaints Policy.



3. RAISING A WHISTLEBLOWING CONCERN

A volunteer should raise their concerns to the Group Hug Group Level Manager they liaise with on a regular basis, preferably in a face-to-face meeting. If the volunteer finds it difficult, the initial contact can be made by email or by video conferencing. The Group Hug Group Level Manager will arrange a meeting with the volunteer to discuss the concern raised as soon as is practically possible.

If the volunteer believes the Group Hug Group Level Manager to be involved, or for any reason does not wish to approach the Group Hug Group Level Manager, then they should report their concerns to a relevant Group Hug System Level Manager/HR.

A meeting (may be via online video conference) will be arranged with the volunteer as soon as possible to discuss the concerns raised. The individual may be accompanied by a trade union representative or a colleague to any meeting under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

After the meeting, a written summary of the concerns will be made, and a copy provided for the volunteer. Where possible, Group Hug will aim to give an indication of how we propose to deal with the matter at this stage. A volunteer who makes such a protected disclosure has the right not to be dismissed, or subjected to victimisation, because he/she has made the disclosure.

4. CONFIDENTIALITY

Group Hug hopes that volunteers will feel able to voice whistleblowing concerns under this policy. However, if a volunteer wishes to raise a concern confidentially, every effort will be made to keep their identity secret. If it is necessary for anyone investigating the concern to know the whistle-blower's identity this will be discussed with the individual.

Group Hug does not encourage volunteers to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information. It is also difficult to establish whether any allegations are credible and made in good faith. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should speak with a relevant Group Hug System Level Manager/HR.

5. EXTERNAL DISCLOSURES

The aim of this policy is to provide a mechanism for reporting, investigating and remedying any wrongdoing. In most cases, it should not be necessary to alert anyone externally. The law recognises that in some circumstances it may be appropriate to report concerns to an external body such as a regulator. We recommend that advice is sought before reporting a concern externally.



Whistleblowing concerns usually relate to the conduct of our volunteers, but they may sometimes relate to the actions of a third party such as a customer, supplier or service provider. The law allows an individual to raise a concern in good faith with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility.

However, Group Hug encourages volunteers to report such concerns to Group Hug first to either to their contact at Group Hug or to a relevant Group Hug System Level Manager/HR.

6. INVESTIGATION AND OUTCOME

Once a concern has been raised, an initial assessment will be carried out to determine the scope of any investigation.

The whistle-blower will be informed of the outcome of the assessment and may be required to attend additional meetings in order to provide further information. In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigation or specialist knowledge of the subject matter.

Group Hug aims to keep the whistle-blower informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving specific details of the investigation or any disciplinary action taken as a result. The whistle-blower should treat any information about the investigation as confidential.

If Group Hug concludes that a whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, further action will be taken, including possible termination of the volunteer's role.

Where the whistle-blower is not happy with the way in which their concerns have been handled, they will be advised of the contact details of the relevant person to speak with. Normally this would be an alternative Group Hug System Level Manager/HR.

7. PROTECTION AND SUPPORT FOR WHISTLEBLOWING

It is understandable that whistle-blowers are sometimes concerned about possible repercussions. Group Hug aims to encourage openness and will support workers who raise genuine concerns in good faith under this policy.

Volunteers must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes termination of your volunteering role, threats or other unfavourable treatment connected with raising a concern. If the whistle-blower believes that they have suffered any such treatment, the matter should be reported to the Group Hug System Level Manager/HR.



Staff and other volunteers must not threaten or retaliate against whistle-blowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

8. RESPONSIBILITY FOR THE POLICY

The Group Hug General Manager has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under the policy.

Group Hug System Level Manager/HR 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 training.

The Group Hug System Level Manager/HR should review this policy from a legal and operational perspective at least once a year.

All volunteers are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.

9. POLICY STATUS

This policy does not cover:

- complaints from staff, who should use Group Hug's Whistleblowing Policy where appropriate
- complaints from staff which are personal, where the member of staff should use Group Hug's grievance procedure
- complaints from volunteers who are dissatisfied about Group Hug's work and where there is no suspected wrongdoing or danger, where you should use the Complaints Policy or the Whistleblowing Policy, as appropriate,

Group Hug may alter or adapt this Policy, and any components of it, at any time.

10. IMPLEMENTATION OF POLICY

This Policy shall be deemed effective as of 16th May 2021. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.