



Whistleblowing Policy and Procedure

1 Introduction

Hope in Haringey is committed to high standards of business conduct and seeks to conduct its affairs in a socially responsible and lawful manner.

Hope in Haringey openly encourages individuals to report any instances of malpractice, dishonesty or unsafe (or unhealthy) working practices that are incompatible with this aim.

Individuals who report such instances in accordance with the terms of this policy will be protected from any form of victimisation, detriment or dismissal and will be given the opportunity to raise their concerns confidentially with senior managers within the business.

2 Definition of Disclosures

It is Hope in Haringey's intention to conduct its affairs in a socially responsible and lawful manner.

Employees and contractors are therefore encouraged to report any practices that are incompatible with this aim.

Such practices could include the following:

- Criminal activity
- Failure to comply with a legal obligation
- Dangers to Health and Safety
- Damage to the Environment
- Financial malpractice or fraud
- Accounting, auditing or any other financial irregularities
- Attempts to deliberately conceal any of the above

The policy applies if the malpractice in question was in the past, is in the present or is likely to be committed in the future.

3 Protection

Individuals who report concerns relating to the malpractices are guaranteed protection against victimisation, detriment and/or dismissal as a result of making their disclosure.

This protection is offered provided that

- the disclosure is made in good faith,
- it tends to show malpractice or impropriety, in the reasonable belief of the person making the disclosure (regardless of whether this is actually the case),
- the person making the disclosure does not breach Hope in Haringey's disciplinary standards in establishing their belief of the malpractice or impropriety in question,
- the disclosure is made to the appropriate person under this policy.

Victimisation, deterring an individual from raising a concern about a malpractice or subjecting an individual to any form of detriment for raising a concern about malpractice in accordance with the principles outlined above shall constitute a disciplinary offence which may result in disciplinary action being taken; up to and including dismissal.

Likewise any individual who makes a malicious and false disclosure in bad faith or breaches Hope in Haringey's disciplinary standards in establishing their belief of the malpractice or impropriety in question may be subject to disciplinary action.

4 Confidentiality

The Company will treat all disclosures in a confidential and sensitive manner.

Whilst individuals making a disclosure will normally be required to provide a statement as part of the investigation process unless the disclosure is anonymous, the Company will seek to ensure so far as is reasonably practicable that the identity and position of the individual making the disclosure is kept confidential and not disclosed without the individual's consent if this is requested. In certain circumstances however, Hope in Haringey may be required to disclose the identity of the individual making the disclosure as a matter of law and cannot guarantee that the investigation process will not reveal the source of the disclosure.

5 Anonymous Allegations

As protection shall be afforded to individuals making a disclosure in accordance with the terms outlined above, individuals are encouraged to put their name to any disclosures they make. Moreover, whilst concerns expressed anonymously will be reviewed and considered at the discretion of Hope in Haringey, such concerns may be far less effective as they are more difficult for Hope in Haringey to investigate and therefore resolve.

In deciding how far Hope in Haringey will (or can) investigate any anonymous complaint Hope in Haringey shall take account amongst other things, of the seriousness of the issue raised, the information available to it and the likelihood of being able to confirm the allegation.

6 The Procedure for Disclosure

6.1 Procedure One

Wherever possible and appropriate, the individual should raise their concerns relating to malpractice at a local level with their immediate line manager or the person responsible for HR.

Any such disclosure should be made in writing.

The issue will then be fully investigated by an appropriate person and if there is evidence of malpractice, appropriate action will be taken to remedy the situation.

Unless the disclosure is made anonymously, the individual making the disclosure shall be invited to a meeting to discuss the issue as part of the investigation process.

Individuals shall have the right to be accompanied at this or any other meeting under this procedure by a work colleague or trade union official.

Following completion of Hope in Haringey's investigation into the issues raised the individual shall be notified in writing about the outcome of the investigation and where possible, on any action that has been taken or is proposed.

In addition, the individual shall be further reminded of their right to raise the matter at a more senior level if they are dissatisfied with the outcome at this stage and shall be provided with details of how this should be done.

6.2 Procedure Two

Whilst individuals are encouraged to use Procedure One to raise concerns about malpractice, Hope in Haringey recognises that it will not always be appropriate for them to do so.

In these circumstances they should instead raise concerns over malpractice in writing with any Director.

This may be appropriate where

- the issue in question involves the individual's line manager or a manager in the individuals reporting line and/or the person responsible for HR,
- the individual fears victimisation or recrimination if the issue is raised via the direct reporting line,
- the employee believes that the matter is of sufficient gravity or urgency to warrants this direct approach, or
- the issue has been already raised at local level using Procedure One and there has been no response or an unsatisfactory response.

Where there is evidence of malpractice, appropriate action will be taken to remedy the situation. Unless the disclosure is made anonymously, the individual making the disclosure shall be invited to a meeting to discuss the issue as part of the investigation process. Individuals have the right

to be accompanied at this or any other meeting under this procedure by a work colleague or trade union official.

Following completion of Hope in Haringey's investigation into the issues raised the individual shall be notified in writing about the outcome of the investigation and, where possible, on any action that has been taken or is proposed. In addition, the individual shall be further reminded of his/her right to raise the matter further with another member of the senior management team.

All actions under the procedures for disclosure shall be undertaken by Hope in Haringey without unreasonable delay and any concerns submitted will normally be acknowledged within five working days of receipt.

End.