

Catch22 policy

Whistleblowing policy

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	<i>People Team</i>
Queries to:	<i>peopleservices@catch-22.org.uk</i>
Date of last review:	<i>September 2023</i>

Date of next review:	<i>September 2026</i>
Catch22 group, entity, hub:	<i>Catch22 Group</i>
4Policies level (all staff or managers only)	<i>All Staff</i>

Document Version Control & Changes

Version	Last modified	By	Changes Made
<i>1.0</i>	<i>01/03/2019</i>	<i>People Team</i>	<i>Policy created</i>
<i>2.0</i>	<i>01/09/2023</i>	<i>People Team</i>	<i>Policy updated</i>

1. Summary

Catch22 is committed to the highest possible standards of openness, probity and accountability.

This policy is designed to ensure that all who work or volunteer for Catch22 know how to raise major concerns that fall outside the scope of other internal policies and procedures and makes it clear that this can be done without fear of victimisation, subsequent discrimination or disadvantage. This Whistle Blowing Policy is intended to encourage and enable employees to raise serious concerns within Catch22 rather than overlooking a problem or “blowing the whistle” outside.

2. What is the policy about?

There are procedures in place for you to lodge a grievance relating to your own employment. The Whistle Blowing Policy is intended to cover major concerns that fall outside the scope of other procedures. These include:

- Conduct which is a criminal offence or a breach of law.
- Disclosures related to miscarriages of justice.
- Health and safety risks, including risks to the public as well as other employees.

- Damage to the environment.
- The unauthorised use of funds.
- Possible fraud and corruption.
- Sexual, physical or verbal abuse.
- Other unethical conduct.

Thus, any serious concerns that you have about any aspect of service provision or the conduct of Catch22 or others acting on behalf of Catch22 can be reported under the Whistle

Blowing Policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe Catch22 subscribes to; or
- Is against Catch22's Policies and Procedures; or
- Amounts to improper conduct.

It is possible that in the course of your work for Catch22, you may identify an act by a third party, not acting on our behalf or part of our service provision arrangements, which raises a serious concern in your mind. Any such issues should be reported using the routes set out in this policy. While Catch22 cannot undertake to directly investigate such matters it will raise these on your behalf with the relevant agency.

3. Who is the policy for?

This policy applies to all Catch22 employees, workers and volunteers. It has been discussed with union representatives and has their support.

4. Policy statement

This policy aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice;
- Provide avenues for you to raise those concerns and receive feedback on any action taken;
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;

- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in the public interest.

5. How does the Whistleblowing policy work?

5.1 Protected Disclosure

In order to make a protected disclosure, you must have a reasonable belief that the issue you wish to “blow the whistle” about is in the public interest. It is important to bear in mind that you do not have to be correct in your belief or have proof of alleged wrongdoing, but you must have a reasonable belief that wrongdoing has been, or is likely to be committed. You have no responsibility for investigating the matter - it is Catch22's responsibility to ensure that an investigation into your disclosure takes place.

5.2 Safeguards: Harassment or Victimisation

Catch22 is committed to good practice and high standards and will be supportive of its employees, workers and volunteers. Catch22 recognises that the decision to report a concern can be a difficult one to make. If you believe what you are saying is true, you should have nothing to fear because you will be taking the right course of action for your employer and those for whom you are providing a service. Catch22 will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith. Any investigation into allegations of potential malpractice will not influence or be influenced by disciplinary or redundancy procedures that already affect you.

5.3 Confidentiality

If you so wish, all concerns will be treated in confidence and every effort will be made not to reveal your identity. At the appropriate time, however, you may need to come forward as a witness. This policy encourages you to put your name to your concern whenever possible.

Concerns expressed anonymously are much less powerful but will be considered at the discretion of the Operational Directors Leadership Team.

In exercising this discretion the factors to be taken into account will include:

- The seriousness of the issues raised;
- The credibility of the concern; and

- The likelihood of confirming the allegation from attributable sources.

You may be asked to justify the grounds of your original complaint especially if the initial investigation does not support your complaint.

5.4 Untrue Allegations

If you express a concern that is in the public interest, but it is not confirmed by the investigation, no action will be taken against you.

However, if you make an allegation which is held to be done frivolously, vexatiously, maliciously or for personal gain, disciplinary action may be taken against you.

5.5 How to Raise a Concern

As a first step, you should normally raise concerns with your immediate manager or his/her senior. You may already have a departmental procedure you can use. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If you believe that management is involved, you can contact your People Business Partner, or senior managers in the Governance, People or Health & Safety teams via the email link Ihaveaconcern@catch-22.org.uk

Concerns may be raised orally initially but should be confirmed in writing. Employees, workers or volunteers who wish to make a written report are invited to use the following format:

- The background and history of the concern (giving relevant dates); and
- The reason why you are particularly concerned about the situation.

The People Business Partner will provide any help you need in expressing your concern.

The earlier you express the concern the easier it is to take action. Although you are not expected to prove beyond all reasonable doubt the truth of an allegation, you will need to demonstrate to the person contacted that on the balance of probabilities there are reasonable grounds for the concern you have raised.

Advice/guidance on how to pursue matters of concern may be obtained from:

- Your People Business Partner – Contact details are on SharePoint
- Or your own Director

You can also report and get advice about fraud or internet crime by calling “Action Fraud” a section of the police on 0300 123 2040 (text-phone 0300 123 2050).

– **having first taken note of the provisions of paragraph 5.8 of this policy.**

You may wish to consider discussing your concern with a colleague first and you might find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite your trade union, professional association representative or a workplace colleague (including LinkUp) to be present during any meetings or interviews in connection with the concerns you have raised. Anyone who helps you will need to respect the confidentiality of the investigation.

5.6 How Catch22 Will Respond

Catch22 will respond to your concerns as soon as is practical. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

Where appropriate, the matters raised may:

- Be investigated by an external investigator, management, internal audit, or through the disciplinary process;
- Be referred to the police;
- Be referred to the external auditor;
- Be referred to the appropriate LADO (Local Authority Designated Officer for Safeguarding); and/or
- Form the subject of an independent inquiry, for example, through the Area Child Protection Committee for child abuse.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle that Catch22 will have in mind is the public interest. Concerns or allegations that fall within the scope of specific Catch22 or statutory procedures will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Within ten working days of a concern being raised, a representative of the People Team or Director will write to you:

- Acknowledging that the concern has been raised;
- Indicating how Catch22 propose to deal with the matter;
- Giving an estimate of how long it will take to provide a final response;
- Telling you whether any initial enquiries have been made;
- Supplying you with information on staff support mechanisms; and
- Telling you whether further investigations will take place and if not, why.

The amount of contact between those considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, Catch22 will seek further information from you.

Where any meeting is arranged, off-site if you so wish, you can be accompanied by a trade union or professional association representative or a workplace colleague (including LinkUp). Catch22 will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings Catch22 will arrange for you to receive advice about the procedure and where appropriate financial or other support.

Catch22 recognises that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

As the investigation progresses, you will be kept informed as to any developments, as far as is possible under the constraints that may apply to Catch22.

5.7 The Responsible Officer

The Chief People Officer has overall responsibility for the maintenance and operation of this policy. A record will be maintained of all concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Operational Directors Leadership Team and the Trustee Audit Committee.

5.8 How the Matter can be Taken Further

This policy is intended to provide you with an avenue within Catch22 to raise and resolve concerns. Catch22 hopes you will be satisfied with any action taken. If you are not, and on the basis that you have exhausted Catch22's internal mechanisms for consideration of your

concern, you have the option to take the matter outside Catch22. The following are possible contact points:

- The external auditor;
- Your trade union;
- Your local branch of Citizens' Advice;
- Relevant professional bodies or regulatory organisations;
- A relevant voluntary organisation; or
- The Police.

If you do take the matter outside Catch22, you should be careful to ensure that your claim meets the definition of a “protected disclosure” and that you do not disclose unrelated confidential information (which would be a breach of your contract of employment). You should check with the People Business Partner before such disclosures are made or alternatively with your trade union, professional advisor or Citizen's Advice.

Lastly, if your concern relates to a third party organisation with whom you have come into contact during the course of your work, but who is not acting on behalf of Catch22, and you are dissatisfied with the response you have received via Catch22 (who will have raised the matter on your behalf), you may also choose to raise this matter externally – although first taking care that your disclosure is “protected” and that you do not include any unrelated confidential information regarding Catch22, its employees, workers or volunteers, stakeholders or service users.

5.9 Interplay with Grievance Policy

If you have chosen to include a “protected disclosure” as a part of a formal grievance then this may, at Catch22s discretion, be investigated and you will receive a response, under the terms of that policy. If you remain dissatisfied with the outcome of the grievance process you will not be able to additionally raise the same, or essentially the same, matters under this policy.

6 Related policies

- Complaints policy
- Bullying and Harassment policy
- Disciplinary policy
- Grievance Policy

Classification : Official

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Whistleblowing Policy
EIA completed by:	Christina Duru, Chief People Officer
Date of assessment:	14 th September 2023
Assessment approved by:	Christina Duru, Chief People Officer

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	The policy applies equally to all members of staff regardless of age. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their age.
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	The policy applies equally to all members of staff regardless of health/disability. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their disability.
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	The policy applies equally to all members of staff regardless of their gender at any given time. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of gender.
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	It's not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave,
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	The policy applies equally to all members of staff regardless of their race, origin, colour or nationality. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively in these respects.

Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	The policy applies equally to all members of staff regardless of their sexual orientation. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because their sexual orientation.
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3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.