**Whistle Blowing Policy**

As part of that commitment, we encourage Volunteers with serious concerns about aspects of our work to come forward and express those concerns. In some cases, we recognize that employees will need to do so on a confidential basis. Silver Slippers wishes to clarify that they can do so with the assurance of being treated with respect and fairness. The purpose of this policy is to provide guidance by which employees can raise concerns appropriately if they have reasonable grounds for believing serious malpractice has occurred or is likely to occur.

**The Public Interest Disclosure Act 1998 (PIDA)** is a law that protects whistleblowers from negative treatment or unfair dismissal. It is part of the Employment Rights Act 1996 and applies to workers who make disclosures in the public interest. The Act protects most workers in the public, private, and voluntary sectors, the act does not apply to voluntary workers.

Disciplinary Procedures may be invoked if it is established that the issue raised is not genuine or is raised with malicious intent.

**SCOPE**

This policy is designed to deal with specific issues as outlined below. This policy is not intended to apply to personal grievances concerning individual terms and conditions of employment, or other aspects of the working relationship.

Such complaints should be dealt with under existing policies which can be found on the SS website.

For a disclosure by an employee to be protected by the Act, it must relate to matters that ‘qualify’. A qualifying disclosure is one which the worker reasonably believes to show one or more of the following matters is happening, took place in the past, or is likely to happen in the future:

 • A criminal offence

 • the breach of legal obligation

• a miscarriage of justice

• a danger to the health and safety of any individual

• damage to the environment; or

• deliberate concealment of information tending to show any of the above five matters A qualifying disclosure to the Charity Commission will be a ‘protected’ disclosure provided the worker:

• discloses in good faith.

• reasonably believes that the relevant failure relates to ‘the proper administration of CIC and funds given, or held, for CIC purposes’; and

• reasonably believes that the information disclosed, and any allegation contained in it are substantially true.

 This policy is for guidance only and does not form part of your contract of employment. Who can raise a concern? This policy applies to all individuals working for us at all levels and grades, whether they are senior managers, Trustees, employees, or volunteers (collectively known as “employees” in this policy)

All employees are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware.

**POLICY**

Recognizing a problem & who to contact When a problem arises, we will always deal with it seriously, in many cases, an employee can raise any concerns informally with their line manager in the first instance. It may be possible to resolve the matter quickly and effectively.

We hope you will feel confident in coming forward knowing that we will act on what you tell us. If an employee feels that they are unable to approach their line manager with a specific concern, they should approach

The Chief Executive: Nigel G Gama

Email:

Phone:

If the allegation is about the Chief Executive, then the person(s) should send this to the Company Secretary (see contacts for full details).

Managers are required to be sensitive to issues involving any type of discriminatory practice or any other discriminatory behaviour. Staff who act under the terms of this policy will be advised when the situation has been dealt with and will be debriefed as appropriate.

**Protection for the individual following the issue:**

Staff who raise a concern must feel able to do so on the understanding that they have nothing to fear and will not suffer reprisals.

**Confidential reporting**

We know that it is never easy to report a concern, particularly one that may relate to fraud or corruption. However, we hope that you will come forward with any concerns at an early stage before problems have a chance to become serious. You may come forward with another colleague if you wish and can be assured that the matter will be dealt with sensitively.

By our confidentiality policy, we will do everything we can to respect your confidentiality, if you have requested this, except in cases such as abuse when the police/social services need to be informed, or another employee is guilty of an offense requiring disciplinary action.

**How should a disclosure be made?**

You can raise your concerns verbally or in writing. You must state that you are using the Whistleblowing Policy and specify whether you wish your identity to be kept confidential.

We will ask you to formalise your concerns in writing either before or after the first meeting.

We will acknowledge receipt of your formal written disclosure and keep a record of further action taken. You are entitled to be accompanied by a workplace colleague or union representative at any meeting under this procedure.

Your 3 companions will be asked to respect the confidentiality of your disclosure and any subsequent investigation. We recognise that disclosures made under this policy may involve highly confidential and sensitive matters and that you may prefer to make an anonymous disclosure. However, we regret that we cannot guarantee to investigate all anonymous allegations.

Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feedback, or ascertain whether your disclosure was made in good faith. Whistleblowers should reveal their identity, and measures can be taken to preserve confidentiality if appropriate.

There may be exceptional circumstances when it might be best to contact an external agency. If you are unsure whether to use this procedure or you would welcome independent advice, or if the problem involves the Chief Executive, the Chair of the applicable Board, abuse of public funds, or abuse of vulnerable adults; and after raising concerns with the organisation the “Whistle Blower” continues to have serious concerns,

 you may wish to contact the CICAIR Registrar: cicair@cic.org.uk

on 020 7399 7422

Anonymous disclosures should be sent by post, addressed Private & Confidential sent to:

The Company Secretary

Alltaj Baluch

Address: Silver Slippers Ltd

 1a Silver Street

 Northamptonshire

 NN8 1BQ

Procedure If you come to us with a concern, we will look into it carefully and thoroughly. We will be fair to you and also to any others involved. If someone is potentially being accused of misconduct, we have to find out their side of the story as well. In our investigation, we will respect your confidentiality and any concerns you have about your own safety or career. We will try to let you know the results of the investigation and about any action that is proposed.

However, in doing this, we have to respect the confidentiality of other employees involved as well. SS is committed to investigating disclosures fully, fairly, quickly, and confidentially where circumstances permit. Following your submission of a formal written disclosure, we will acknowledge receipt within 10 working days and make arrangements for investigation if appropriate in the circumstances.

The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, we will carry out an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.

 In any event, a report will be produced, and copies will be provided to the board, where appropriate, you will also receive a copy. If you are dissatisfied with the investigation or its conclusion, then you should write directly to the Secretary detailing your concerns.

 If a longer investigation is considered necessary, we will usually appoint an investigator or investigative team including personnel with experience of operating workplace procedures or specialist knowledge of the subject matter of the disclosure. For example, if the disclosure concerns financial malpractice, the Treasurer may be asked to investigate. Separate personnel will be asked to make a judgment on the report submitted by the investigator (or investigative team). Recommendations for change will also be invited from the investigative team to enable us to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered.

The Company Secretary will then be responsible for reviewing and implementing these recommendations. So far as we consider it appropriate and practicable, you will be kept informed of the progress of the investigation.

However, the need for confidentiality may prevent us giving you specific details of the investigation or actions taken. It is not normally appropriate to set a specific timeframe for the completion of investigations in advance, as the diverse nature of disclosures contemplated makes this unworkable. We will, however, aim to deal with all disclosures in a timely manner and with due regard to the rights of all individuals involved. We recognise that there may be matters that cannot be dealt with internally and in respect of which external authorities will need to be notified and become involved either during or after our investigation. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or seek your consent if we consider it appropriate.

**Confidentiality**

 Every effort will be made to keep the identity of an individual who discloses this policy confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved confidential. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure. It is likely, however, that your role as the whistleblower could still become apparent to third parties during the course of an investigation.

**Protection and support for whistleblowers**

No member of staff who raises genuinely held concerns in good faith under this procedure will be dismissed or subjected to any detriment as a result of such action.

Detriment includes unwarranted disciplinary action and victimisation. If you believe that you are being subjected to a detriment within the workplace as a result of raising concerns under this procedure, you should inform the Company Secretary, or if your concern is regarding the CS, then contact the Chief Executive. Employees who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

Those choosing to make disclosures without following this procedure or anonymously may not receive this protection. If an investigation under this procedure concludes that a disclosure has been made maliciously, in bad faith or with a view to personal gain, the whistleblower will be subject to disciplinary action.

**Personnel responsible for the implementation of policy**

The Company Secretary has overall responsibility for Silver Slippers' policy on Whistleblowing but has delegated day-to-day responsibility for overseeing and implementing it to the Leadership Team.

Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change within the organisation resulting from investigations into complaints under the policy lies with the secretary. Managers have a specific responsibility to facilitate the operation of this policy and to ensure that workers feel able to raise concerns without fear of reprisals by the procedure set down below.

**Monitoring and review of policy**

Responsibility for monitoring and reviewing the operation of the policy and any recommendations for change within the organisation resulting from investigations into complaints under the policy lies with the Secretary.

This policy will be reviewed annually.

Put together by A Baluch.