

**Buckinghamshire Community Wellbeing (BCW) Hub**  
**Document Identity**

<b>Title:</b>	Whistleblowing Policy		
<b>Document Ref:</b>		<b>Version:</b>	Second Version
<b>Date of original publication:</b>	18 December 2024	<b>Date of this version:</b>	26 <sup>th</sup> January 2026
<b>Review Scheduled:</b>	January 2027	<b>Obsoletes:</b>	
<b>Status:</b>	Active	<b>Comments:</b>	
<b>Policy</b> Adopted by BCW Hub:  Signed on behalf of management board:  Date:	26 <sup>th</sup> January 2026  Ruth Farewell, Chair of the Board of Trustees  26 <sup>th</sup> January 2026		



## Whistleblowing Policy

### Introduction

Buckinghamshire Community Wellbeing (BCW) Hub is committed to the highest standards of openness, probity, and accountability. As part of our commitment to good practice, BCW Hub strives to create a culture in which it feels safe and acceptable to raise concerns. We regard genuine whistleblowing as important in helping the organisation manage or avert disaster and reputational damage.

This policy outlines a mechanism to enable BCW Hub's trustees, employees, students and volunteers to voice whistleblowing concerns, i.e., about serious malpractice or of a serious failure to meet a legal obligation that could potentially be of public concern. It also aims to protect those who 'blow the whistle' from fear of reprisal. The term "worker" used throughout this policy includes trustees, employees, students and volunteers and includes contractors.

It should be noted that concerns from service users more usually follow the complaints procedure. While it is hoped that most concerns can be dealt with openly through internal procedures, it is recognised that in some circumstances, it may be preferable for the whistleblower to report concerns anonymously, or to an external body.

BCW Hub has set out the provisions below to ensure that no employee or volunteer should feel at a disadvantage in raising legitimate concerns. The policy has been developed using the Whistleblowing Arrangements Code of Practice (PAS 1998:2008) and follows recommendations made by the Committee on Standards in Public Life.

### Definitions

A valid Whistleblowing concern is defined as a reasonable and honest suspicion a worker has about a possible fraud, malpractice, danger or other serious risk that threatens service users, colleagues, members of the public or the organisation's own reputation. A Whistleblower is best viewed as a witness who is putting the organisation on notice of a risk.

Whistleblowing concerns are in the public interest and may at least initially be investigated under this provision but may then lead to the invocation of other procedures e.g., disciplinary. Whistleblowing concerns could include:

- Business malpractice or impropriety;
- Failure to comply with a legal obligation;
- Dangers to Health and Safety or the environment;
- Criminal activity;
- Improper conduct or unethical behaviour
- Attempts to conceal any of these.

Examples include fraud, embezzlement, accepting payments for awarding contracts, misreporting performance data, favouring candidates at interview.

Whistleblowing is distinct from private complaints or grievances; therefore, this policy does not cover the following examples:

a) Personal grievances concerning an employee's terms and conditions of employment, or other aspects of the working relationship, complaints of bullying, harassment, discrimination, or disciplinary matters. These should be addressed under the appropriate policy.

b) Complaints made by service users about BCW Hub's service or policies, or the conduct of employees, volunteers or trustees. Such matters will be dealt with under the Complaints policy.

c) Complaints made by volunteers about issues that relate to their volunteer role e.g., working conditions, relationships, service delivery matters. Volunteers may wish to discuss such complaints with their line manager or Hub Manager and may consider following complaints procedure.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, business, or strategic decisions taken by BCW Hub. It is not a way of breaching confidentiality.

### **Outline of Internal Procedure**

- 1) Concern is raised
- 2) Concern is assessed: valid Whistleblowing concern? Or remit of another policy?
- 3) Details are passed on to the appropriate Investigating Officer
- 4) Investigation is conducted
- 5) Other relevant policies may also be invoked (e.g., Disciplinary); external bodies may be involved
- 6) Outcomes are fed back to complainant, as appropriate
- 7) Central record is kept

In cases where there is no agreed neutral Investigating Officer within the organisation, an external Investigating Officer may be appointed.

### **Key Issues**

#### **Protecting whistleblowers**

The Public Interest Disclosure Act, 1998, gives legal protection to employees and volunteers against being dismissed or penalised by their employers because of publicly disclosing certain serious concerns.

BCW Hub's policy and procedures offer protection to those who disclose such concerns provided the disclosure is made:

- in good faith

- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety
- To an appropriate person (see below).

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious allegations could give rise to legal action on the part of the persons complained about.

A worker who blows the whistle who has also been involved in misconduct is not protected from disciplinary procedures for their own conduct.

### **Confidentiality**

BCW Hub will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

It is important that, where confidentiality relating to the identity of the whistleblower has been agreed, it should be respected where possible. However, the whistleblower should be made aware that information given may necessarily need to be disclosed to others if the issue is to be investigated, resolved, or managed. An Investigating Officer should make clear that BCW Hub cannot guarantee that others will not try to deduce their identity.

### **Anonymous allegations**

This policy encourages individuals to put their name to any disclosures they make, if appropriate. It is preferable to deal openly with concerns and BCW Hub will do its utmost to protect the complainant from reprisal.

When concerns are expressed anonymously, they may be harder to investigate, however, they will be considered at the discretion of BCW Hub taking the following into account:

- The seriousness of the issues raised;
- The credibility of the concern;
- The likelihood of confirming the allegation from attributable sources.

### **Unfounded allegations**

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and persists with making them, disciplinary action may be taken against that individual.

### **Reporting externally**

While it is hoped concerns will be raised internally, the organisation recognises that workers can also contact an appropriate external body. In addition, if an internal investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcomes, BCW Hub recognises the lawful rights of workers and ex-employees to make disclosures to prescribed persons. External bodies may include the Health and Safety Executive, Charity Commission, or, where justified, elsewhere. Employees are encouraged to seek guidance from the Protect confidential helpline when considering external disclosure (see section below on Support & Further Information).

Where a concern is brought to BCW Hub's attention by an external body, an internal investigation may be conducted, following the outline below and liaising or working with the external body as necessary.

### **Procedures for Making a Disclosure**

## **Raising a concern**

Workers are encouraged to share concerns at an early stage. Concerns should usually be raised with immediate line manager initially. Disclosures may be made verbally or in writing. Should the line manager be the subject of concern, the concern can be raised directly with either the Hub Manager or a member of the Board of Trustees, as appropriate.

## **Receiving and assessing the concern**

The member of staff who receives the concern should record the key details and establish along with the complainant whether it is a whistleblowing concern. Assistance from the Hub Manager may be desirable or necessary at this stage.

The person/s hearing the concern should explain to the complainant if they think it is a whistleblowing concern and that BCW Hub's whistleblowing policy will be followed. If it is determined that the concern comes under the remit of a different policy (e.g., grievance, complaints, dignity at work), the complainant should be notified, and the correct procedure should be followed.

It may be deemed most appropriate to address a concern through a routine audit. This may be the most satisfactory course of action where, for example, there are very limited facts, or the whistleblower wishes to remain strictly anonymous. Such a decision should be made involving Hub Manager/appropriate trustee/s, taking the views of the complainant into consideration.

## **Investigating the concern**

Information must be passed as soon as is reasonably possible, to the appropriate designated Investigating Officer as follows:

- Complaints of malpractice will be investigated by the service manager/coordinator unless the complaint is against the service

manager/coordinator or is in any way related to their actions. In such cases, the complaint should be passed to the Hub Manager for referral.

- Concerns involving the Hub Manager should usually be passed to an appropriate Investigating Officer from the Board of Trustees.
- The complainant has the right to bypass the management structure and take their complaint direct to the Board of Trustees. The Board has the right to refer the complaint back to a member of the management team if it is felt that they, without any conflict of interest, can more appropriately investigate the complaint.

If there is evidence of criminal activity, then the issue should be referred to the police. In these cases, consent from the victim/survivor will be sought where possible and support offered around this process. BCW Hub will ensure that any internal investigation does not hinder a formal police investigation.

### **Timescales**

Due to the varied nature of these sorts of complaints, which may involve internal/external investigators and/or the police, it is not possible to lay down precise timescales to cover all investigations. The Investigating Officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations. The Investigating Officer should estimate the timescale at the outset of each investigation, subject to further review.

### **Responding to the Whistleblower**

The Investigating Officer should as soon as practically possible, send a written acknowledgement of the concern to the complainant, stating an estimated timescale/review date where possible and thereafter report back to them in writing the outcome of the investigation and the action that is proposed. It should, however, be made clear that while the organisation will give as much feedback as it properly can, due to the legal obligations of confidentiality it owes to employees, it may not be able

to provide feedback on the outcome of any disciplinary action taken against an employee.

If the investigation is prolonged, the Investigating Officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home or personal email address (as agreed).

### **Investigating Procedure**

The Investigating Officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- Clarify if and what level of confidentiality is sought.
- Consider support needs of complainant and address any anxieties about reprisal.
- The Investigating Officer may need to consider the involvement of the Police at an early stage and should consult with the Board of Trustees if appropriate. Consent from complainant should be sought where possible before making any Police or other formal reports.
- The Investigating Officer should inform the member of staff or volunteer against whom the complaint is made as soon as is practically possible (except where external advice, for example, by the police, is not to do so initially).
- The member of staff or volunteer will be informed of their right to be accompanied by a representative at any future interview or hearing held under the provision of these procedures.
- The allegations should be fully investigated by the Investigating Officer with the assistance, where appropriate, of other individuals / bodies.
- A judgment concerning the complaint and validity of the complaint will be made by the Investigating Officer. This judgment will be detailed in a written report containing the findings of the investigations and reasons for the judgment. The

report will be passed to the service manager/coordinator or Hub Manager/Senior Leadership Team as appropriate.

- The service manager/coordinator/Hub Manager will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate BCW Hub procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the Board of Trustees to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the Investigating Officer, they have the right to raise it in confidence with the service manager/coordinator/Hub Manager, or a member of the Board of Trustees.

### **Recording**

All Whistleblowing concerns and investigation outcomes are recorded centrally, complying with BCW Hub's data protection policy.

### **Communicating and Reviewing the Policy**

Staff, volunteers, and trustees will be informed of the policy during their induction and will be given a copy as part of their workers' handbook. A copy of the policy will also be available on the shared file system.

The policy will be reviewed annually by the Board of Trustees and Hub Manager.

### **Support and Further Information**

BCW Hub will not tolerate reprisals against a worker because they have raised concerns under the policy. Any reprisals will be considered under disciplinary procedures. This assurance is not extended to those who maliciously make a false whistleblowing allegation. A maliciously false allegation will be dealt with through disciplinary routes.

The whistleblower can obtain free confidential advice from an independent charity, Protect. This organisation has practical experience of whistleblowing and can advise on whether and how to raise a concern. The helpline number of Protect is 020 3117 2520. Further info can be found at <https://protect-advice.org.uk/>