



Key Contact: Senior Management Team (SMT)

Date : 1st June 2025

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Whistleblowing Policy

At Survivors' Network, we are brave, we are compassionate, we are empowering and we are collaborative. These values guide how we interact with each other and serve our community.

This means:

We centre survivors in everything we do

We pay attention to and transform power

We practice care and love

We tackle intersecting forms of oppression

We build a culture of openness and are open to change

We do the work

We believe that by living these values, we can create a stronger and more effective charity that makes a meaningful difference in the world.

We strive to ensure that these values are reflected in the creation and implementation of all Survivors' Network policies.

Definition

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the charity is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

Survivors' Network is committed to the highest standards of openness, honesty and transparency and we recognise that it is essential that we are accountable to everything that happens within the charity.

Whilst we strive for exceptional service delivery, we also must ensure that, where an individual discovers information which they believe shows a serious malpractice or wrongdoing within Survivors' Network, then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of either the CEO or Management Committee should one of these parties form a part of the concern.

The Public Interest Disclosure Act gives legal protection to employees and volunteers against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Survivors' Network has endorsed the provisions set out below so as to ensure that no employee, volunteer or service user should feel at a disadvantage in raising legitimate concerns.

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

- Financial 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 including issues of child and vulnerable adult protection
- Attempts to conceal any of these

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 Survivors' Network nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Staff and volunteers can use the grievance process to raise a grievance that falls outside of the remit of this policy. It is reasonable to expect staff, volunteers and service users to use the whistleblowing procedures rather than air their concerns outside the charity.

This policy is designed to offer protection to those employees, volunteers and service users of Survivors' Network 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 and if they make the disclosure 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.

Confidentiality

Survivors' Network 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.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are more difficult to investigate, but they may be considered at the discretion of Survivors' Network.

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

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

Untrue 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, in particular, persist with making them, disciplinary action may be taken against that individual.

Qualifying disclosures

Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that you genuinely and reasonably believe is in the public interest and shows that the charity has committed a "relevant failure" by:

- Committing a criminal offence
- Failing to comply with a legal obligation
- A miscarriage of justice
- Endangering the health and safety of an individual
- Environmental damage or
- Concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The charity will take any concerns that you may raise relating to the above matters very seriously.

The Employment Rights Act 1996 provides protection for workers who 'blow the whistle' where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be "in the public interest". We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the charities grievance policy. Where a concern is raised under the whistleblowing policy

where it is not appropriate to do so, ie it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

The procedure

Staff and volunteers can make a complaint of malpractice to any member of the senior team or any trustee at Survivors' Network.

On receipt of a complaint of malpractice, the member of staff/trustee who receives and takes note of the complaint must pass this information as soon as is reasonable possible, to the appropriate designated investigating officer, as follows:

- Complaints of malpractice will be investigated by one of the SMG unless the complaint is against the SMG or is in any way related to the actions of the SMG. In such cases, the complaint should be passed to the Survivors' Network Chair of Trustees for referral.
- In the case of a complaint which is in any way connected with but not against the SMG, the Chair will nominate a member of the Management Committee to act as the alternative investigating officer
- Complaints against the Chair should be passed to the SMG who will nominate an appropriate investigating officer from the Management Committee
- The complainant has the right to bypass the management structure and take their complaint directly to the Chair. The Chair has the right to refer the complaint back to the SMG if they feel that the SMG, without any conflict of interest, can more appropriately investigate the complaint.
- Complaints about the whole of the Management Committee, or where an individual does not believe that a complaint could be fairly investigated by a member of the current board should be directed to the Charity Commission.

If there is evidence of criminal activity then the investigating officer must inform the police. Survivors' Network will ensure that any internal investigation does not hinder a formal police investigation.

In the first instance you should report any concerns you may have to your line manager where the concern relates to your line manager or it is not appropriate to make the report to your line manager. All concerns reported will be treated in the utmost confidence.

Following receipt of a disclosure made under this policy, an investigation meeting will be held. The purpose of this meeting is to gather as much information as possible from you regarding your concerns, including whether you have any supporting evidence or can identify any witnesses.

This meeting will be held within *14 days where possible* following receipt of the disclosure.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

This investigation must be completed within *21 days* following receipt of the disclosure. If this is not possible, the investigating manager will speak to you in advance of the completion deadline to agree an extended period of investigation.

Once the investigation is complete, the investigation manager will write to you confirming the outcome.

If you are not satisfied with the explanation or outcome, you may raise the matter with the SMT or the appropriate official organisation or regulatory body.

Formal action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and/or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should, as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant updated.

Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained in the consultation with the staff involved.
- The member of staff or volunteer making the complaint 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 investigating officer should consider the involvement of the Police at this stage and should consult with the Management Committee.
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate of other individuals/bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement 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 CEO or Chair of Trustees as appropriate.
- The CEO or Chair of Trustees will decide on what action to take. If the complaint is shown to be justified then they will invoke the disciplinary or other appropriate Survivors' Network

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 Management Committee 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 CEO or Chair, or a member of the Management Committee.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcomes of the investigation, Survivors' Network recognises the lawful rights of all employees, volunteers, former employees and service users to make disclosures to prescribed persons (such as Health and Safety Executive or the Charity Commission) or, where justified, elsewhere.

The Chair of Trustees can be contacted on trustees@survivorsnetwork.org.uk

Protection against detrimental treatment

Everyone who raises matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.