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# WHISTLEBLOWING POLICY AND PROCEDURES



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## 1. ABOUT THIS POLICY

- 1.1 Good Vibrations is committed to conducting business with honesty and integrity. We expect all staff and team-members to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.
- 1.2 This policy covers all employees, contractors, volunteers, trustees, and freelancers.
- 1.3 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2. WHAT IS WHISTLEBLOWING?

- 2.1 Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud, criminal activity, miscarriages of justice, health and safety risks, damage to the environment, and breach of legal or professional obligations.
- 2.2 It also includes the following matters:
  - (a) Taking banned materials or substances into or out of secure establishments
  - (b) Illegally/irresponsibly giving people in prison information from the outside and vice versa
  - (c) Not managing information security, safeguarding or people's health and safety adequately when working with vulnerable people
- 2.3 Social media has sadly become a platform for people to abuse others and in some cases this breaches criminal law, e.g. in relation to racism, prejudice and discrimination. Should team members suspect any wrongdoing or dangers in relation to our activities on social media they should also alert Good Vibrations to their concerns, using the procedures below.

## 3. HOW TO RAISE A CONCERN

- 3.1 We hope that you will be able to raise any concerns with the Executive Director, Katy Haigh on [katy@good-vibrations.org.uk](mailto:katy@good-vibrations.org.uk) or 07535 145 797.
- 3.2 If you prefer not to raise it with Katy for any reason, contact the Chair of the Board, Jonathon Hollow on [Jonathan.hollow@gmail.com](mailto:Jonathan.hollow@gmail.com) or 07977 130 290.
- 3.3 We will arrange a meeting with you as soon as possible to discuss your concerns. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

## 4. CONFIDENTIALITY

- 4.1 We hope that team members will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating it.

## 5. EXTERNAL DISCLOSURES

- 5.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrong-doing in the workplace. In most cases, you should not find it necessary to alert anyone externally.

- 5.2 If, however, you witness a wrongdoing whilst delivering Good Vibrations activity on another organisation's site, e.g. a secure establishment or community partner, you must:
- (a) Immediately inform the organisation in question of the suspected wrongdoing via their own whistleblowing procedures to avoid risks to others
  - (b) Inform Good Vibrations too using these whistleblowing procedures so that the whistle-blower can be supported.
- 5.3 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. *Protect* offers free, confidential whistleblowing advice on 020 3117 2520.

## 6. PROTECTION AND SUPPORT FOR WHISTLE-BLOWERS

- 6.1 We aim to encourage openness and will support whistle-blowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 6.2 Whistle-blowers must not suffer any detrimental treatment because of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Executive Director or Chair of the Board of Trustees immediately.
- 6.3 You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action.
- 6.4 However, if we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

## 7. THE 2010 BRIBERY ACT

- 7.1 According to the 2010 Bribery Act - [gov.uk/anti-bribery-policy](http://gov.uk/anti-bribery-policy) - organisations such as Good Vibrations can be found liable for failing to prevent their team-members from bribing on their behalf.
- 7.2 We therefore ask all team members to make themselves aware of this act and to ensure they comply with it. See the *Bribery Act Quick Start Guide* - [justice.gov.uk/downloads/legislation/bribery-act-2010-quick-start-guide.pdf](http://justice.gov.uk/downloads/legislation/bribery-act-2010-quick-start-guide.pdf) too.

## 8. PUTTING THIS POLICY INTO PRACTICE

- 8.1 Good Vibrations' Executive Director will ensure this policy is reviewed once every 2 years to check it is robust and accurate. Trustees will be asked to approve each iteration of it.
- 8.2 Staff, contractors and trustees embarking on work with Good Vibrations are required to read the organisation's full range of policies and procedures, giving confirmation that they have read and understood them. They must adhere to this policy and procedures in their Good Vibrations work.
- 8.3 Volunteers working with Good Vibrations must read the policies and procedures, set out in the *Volunteer Handbook*, giving written confirmation that they have read and understood them and will adhere to them in their Good Vibrations work.
- 8.4 Good Vibrations will provide regular opportunities for training and discussion about the practical implementations of this policy to take place with the team.