

**Registered
society
Company
number IP032056**

c/o Sunnyside Rural
Trust,
Civic Centre,
161-163 Hight Street,
Berkhamsted,
HP4 3HD

Whistle Blowing Policy	
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Approved by GUCE Directors on: TBC	
Signed: _____	
Print name: _____	
Position: Director	
Reviewed:	Amendments:

POLICY STATEMENT

- 1.1 Whistle-blowing is where a Stakeholder, volunteer, shareholder or member (Stakeholder) raises concerns about underhand or illegal practices within the workplace. This includes the Society's fundraising activities.
- 1.2 The Society, at all times, conducts its business with the highest standards of integrity and honesty. It expects all Stakeholders to maintain the same standards in everything they do. Stakeholders are therefore encouraged to report any actions by Society Stakeholders and those of any third party they believe fall short of these business principles.
- 1.3 The Society is committed to maintaining an open culture with the highest standards of honesty and accountability where any legitimate concerns can be reported in confidence. All cases of malpractice will be taken seriously.
- 1.4 The Society will not treat an individual detrimentally if they honestly and reasonably believe that underhand or illegal practices are taking place, and will protect them from victimisation, harassment or bullying occasioned as a result of the disclosure. Any reprisal or similar action taken against them after making a protected disclosure under this policy may be regarded as gross misconduct by a Stakeholder and may result in disciplinary action being taken.
- 1.5 The Society recognises that Stakeholders may not always feel comfortable about discussing their concerns internally, especially if they believe that senior individuals are responsible for the wrongdoing. The aim of this policy is to ensure that Stakeholders are confident that they can raise any matter with the Society that concerns them in the knowledge that it will be taken seriously, treated as confidential and that no action will be taken against them.
- 1.6 Where Stakeholders have concerns or questions relating to any of the following, they should report their concerns immediately to the Directors:
 - A criminal offence
 - A failure to comply with a legal obligation
 - A miscarriage of justice

- Danger to health and safety
- Danger to the environment
- Breach of contract
- Negligence on the part of the Society
- Financial conduct of the Society or any of its Stakeholders
- Concerns regarding safeguarding children or vulnerable adults
- Deliberate concealment of information relating to the above.
- Actions which adversely affect the Society's reputation

1.7 If a Stakeholder fails to notify the Society of any of the above it may be regarded as misconduct.

1.8 In certain circumstances where a Stakeholder is concerned about wrongdoings or failures they can make disclosures externally to certain prescribed persons or bodies.

1.9 However if a Stakeholder does this without notifying the Society first without good reason it may be considered misconduct – if the Society is unaware of an issue it is unable to act expediently, therefore a Stakeholder should follow the procedures under this policy in the first instance.

1.10 The Society keeps a record of all complaints and reports annually to the Shareholders. Any complaints relating to fundraising are reported to the Fundraising Regulator.

1.11 Staff are required to complete an Annual Declaration of Interests as part of best practice in transparency.

2 PROCEDURE

2.1 Stakeholders should discuss the matter with another Stakeholder in the first instance; if not appropriate the next tier of management should be approached. An informal approach will be treated as completely confidential.

2.2 Volunteers should report matters to a Director of the Society in writing either via its email address guceltd@gmail.com or to the postal address at the top of this policy.

2.3 Whilst investigating the matter, the Society may require the individual to provide further information. Any information provided under this procedure, including the fact that a concern has been raised with the Society, will remain confidential between the individual, the person with whom it was first raised, the person investigating it and, if necessary, the Directors. However, depending on the nature of the matter raised, the Society may be required by law to disclose some or all of the information to a third party, in which case the individual will be informed.

2.4 If the need for an investigation to be carried out is identified, the matter will be brought to the attention of the Directors (or an individual Director if another Director is implicated). Directors will not themselves attempt to undertake any detailed investigation of the possible irregularity, and they must not discuss their suspicions or those reported to them with anyone other than the Directors. To do so, it may be considered as gross misconduct.

2.5 If the matter requires further investigation, such an investigation will be carried out and the individual will be informed of the outcome of the investigation and what, if any, action has been taken.

2.6 Where a Director acts as one of the investigating officers, then any subsequent disciplinary hearing cannot be led by that Director.

- 2.7 If the Stakeholder is unhappy about the speed or conduct of the investigation, or the way in which the matter has been resolved, they should refer the matter to the Directors or an individual Director if another Director is implicated. When s/he has investigated the matter they will tell the individual the result of the investigation and what, if any, action has been taken.
- 2.8 The Society undertakes that no Stakeholder who makes a bona fide report under this procedure will be subjected to any detriment as a result. In the event that a Stakeholder believes they are being subjected to a detriment by any person within the organisation as a result of the decision to invoke the procedure they must immediately inform the Directors; appropriate action will be taken to protect them from any reprisals.
- 2.9 If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another Stakeholder, this will constitute misconduct and will be dealt with in accordance with the terms of the Society's disciplinary procedure for employees and volunteer policy for volunteers
- 2.10 The Society is keen to hear of any concerns that Stakeholders may have about wrongdoing at work and encourages them to use the procedure described in this document wherever possible.
- 2.11 The Society recognises there may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is necessary the Society reserves the right to make such a referral without the Stakeholder's consent.
- 2.12 If the Stakeholder feels that the matter has not been properly investigated by the Society, there are various external organisations with whom they may raise their concerns. Examples of these organisations are:
- Whistleblowing Commission - Public Concern at Work
 - Health and Safety Executive
 - HMRC
 - Fundraising Regulator
 - Charity Commission
- 2.13 Under the Public Interest Disclosure Act 1998, disclosures to persons outside the Society should only be made if the Stakeholder honestly and reasonably believes the allegation to be true.
- 2.14 A Stakeholder may find the circumstances leading to use of the whistle blowing policy stressful.

End of policy