



The Hullavington Community Benefit Society Limited

Whistleblowing Policy

INTRODUCTION:

The Hullavington Community Benefit Society Limited (HCBS) is keen to ensure that any discrimination, harassment, fraud, misconduct, unethical behaviour or wrongdoing, is reported and dealt with fairly.

The HCBS wants to encourage a trusting and supportive environment for all working with us, including volunteers and in the future, employees. As part of this, we want to ensure that people feel able to speak up when they suspect wrongdoing (whistleblowing).

Whistleblowing Concerns

Whistleblowing is the disclosure of information relating to illegal, unethical, or unacceptable conduct and may include:

- Criminal behaviour
- Failure to comply with legal, professional, or regulatory obligation
- Actions causing danger to health and safety; bribery or corrupt activity.
- Financial fraud
- Significant mismanagement
- Behaviour that affects individuals' well-being (harassment/intimidation/bullying/etc)
- Damage to the environment e.g., fauna or flora
- Any attempt to cover up any information relating to the above.

Policy

This Policy aims to encourage any person or persons, including volunteers and future employees, to report suspected wrongdoing as soon as possible and ensure they are aware such a policy exists; how they can make a disclosure and ensure they are protected from any sanction, unless any accusation proves to be malicious or unfounded.

Procedures

Any whistleblowing issues should be reported to the Secretary to the HCBS, who takes on the role of Whistleblowing Officer (WBO), or the Chair or Vice-Chair. They will decide how the issue should be resolved and a record will be kept of any decision made.

Where appropriate, professional guidance will be sought.

Protection For Whistleblowers

A person who raises a whistleblowing concern has the right not to be subjected to any detriment for having done so provided that there is the reasonable belief that one of the above activities is taking place.

If a person believes they are being subjected to a detriment as a result of any concerns they raise under this policy, they should inform the WBO, Chair or Vice-Chair of the HCBS.

If any person tries to discourage a person from coming forward to express a concern, or subjects them to detriment for raising a concern, disciplinary action may be taken against that individual.

Confidentiality and Anonymity

We want persons to feel comfortable about raising whistleblowing concerns. If we are asked to treat the concern confidentially, we will not disclose the person's identity without consent, unless it is necessary in order to further investigate or if we are required to do so by law.

There may be matters that cannot be dealt with internally and external authorities will need to become involved. Where this is the case, we reserve the right to make such a referral without the person's consent.

False or Malicious Allegations

In making a disclosure the person should exercise due care to ensure the accuracy of the information. Where a concern is raised under the whistleblowing procedure in good faith, but which is not confirmed or supported by subsequent investigation, no action will be taken against the person raising the concern.

If, however, a person raises a concern which is knowingly false or malicious, the person raising the concern may be subject to formal disciplinary action.

Policy Owner

The owner of this policy is the Secretary to the HCBS, who takes on the role of Whistleblowing Officer (WBO) and is responsible for reviewing the policy at every two years from date of last approved version.

A confidential log of all concerns raised will be kept by the WBO and anyone involved in any concern raised will retain all relevant correspondence until after the completion of an investigation and all escalation routes have been exhausted, and the outcome of any investigation has been reported to the person who raised the concern.

Whistleblowing Procedure

Any complaints should be made in writing and given to the WBO in the first instance. The WBO will investigate the complaint either to resolve matters or to refer it to the Chair or Vice-Chair of the HCBS for further consideration. Written records will be maintained.

A decision will then be taken on how to respond in the appropriate manner. This will usually involve making further enquiries in the first instance.

An investigation may then be arranged into the concern raised, and the WBO will appoint an appropriate person to undertake the investigation. This may be any member of the HCBS – they will be named the Investigating Officer.

The investigation may involve gathering statements from individuals involved. Any investigation will be carried out in accordance with the Policy set out above.

The Investigating Officer will then report to the HCBS, which will take any necessary action, including reporting the matter to any appropriate regulatory agency.

On conclusion of any investigation, the person who raised concerns will be informed, as far as possible, of the decisions taken and outcome of the investigation and what the HCBS has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained as far as possible. We will not however be able to disclose any matters that would compromise our duty of confidentiality to others.

HCBS Investigation Process – Guidance for Investigators

- The person must not be treated differently because they have spoken up. If this happens it could be investigated and may lead to disciplinary action.
- If the allegations were made anonymously, a thorough investigation should be carried out but no attempt should be made to identify the whistleblower
- If the allegation was not made anonymously, you must not reveal the whistleblower's identity without their consent:
- The nature of the investigation may mean you need to contact the individual for information (if not raised anonymously)
- You should ask the whistleblower if they want to remain anonymous, and if this is so, confirm to them that their identity will not be shared
- Reassure the whistleblower that they will not be treated differently for speaking up.
- Consider who else you need to speak to in order to conduct the investigation

Timescales

- The investigation should be carried out as quickly as possible, whilst ensuring to be thorough
- Inform the person who raised the concerns if the investigation is taking longer than envisaged

- Keep the person who raised the concerns informed on progress of the investigation
- If the matter is of a very serious nature and you are unsure how to proceed, speak with the WBO.

Investigation Outcomes

There are likely to be different outcomes depending on the nature of the complaint and investigation, and as a result of the findings of the investigation.

In all cases, on completion of the investigation, the outcome must be provided to the WBO to be logged for reporting purposes.

If nothing is found to support the person’s concern, or you find evidence to suggest it isn’t true, you should inform the person that an investigation has taken place and there is no information to support their concern (remember; a whistleblower’s complaint does not have to turn out to be true; there simply has to be a reasonable belief that it was true when they raised it).

If evidence is found to support the person’s concern, necessary steps should be taken to resolve the matter.

If the person who raised the concern asks for feedback, thank the person for speaking up and reassure them that it has been taken seriously and investigated. Inform the person that actions are being taken to address the issues raised but do not inform them about any action taken against other persons as this is confidential.

Record Keeping

Once the whistleblowing case is concluded, any paperwork should be retained in a secure location, for a period of six years in case it needs to be referred to.

POLICY & PROCEDURE VERSION CONTROL:

The Policy and Procedures will be reviewed following the appointment of the Tenant and thereafter regularly, at least every two years.

Version	Management Committee Review and approval date	Next Review Date	Summary of changes
1.0	27/05/2024	May 2026	New policy and procedures prepared & approved