



WS14 - Whistleblowing Policy and Procedure

1. Introduction

- a) Wellspring Therapy & Training is committed to the highest possible standards of openness and accountability.
- b) In line with that commitment, employees and others with any serious concerns in relation to Wellspring Therapy & Training's work are strongly encouraged to come forward and voice those concerns.
- c) Staff and volunteers will be fully supported in this and will be able to do so without fear of reprisal.
- d) This Whistleblowing Policy is intended to encourage and enable individuals to raise serious concerns within Wellspring Therapy & Training (rather than overlooking a problem or "Blowing the Whistle" outside of the organisation). Notwithstanding this, concerns may be raised outside the organisation should an individual deem this necessary.
- e) It is recognised that certain cases will have to proceed on a highly confidential basis.

2. Aims of the Policy

This policy aims to:

- a) Provide avenues for concerns to be raised,
- b) Allow individuals to take the matter further if they are dissatisfied with the charity's response,
- c) Reassure all staff and volunteers that they will be protected from reprisals or victimisation, as far as possible, for "Whistleblowing" in good faith.

3. Scope of the Policy

- a) Policies and procedures are already in place to protect individuals, including, but not exclusively, the Harassment and Bullying and Grievance Policies. This Whistleblowing Policy is intended to cover concerns that fall outside the scope of other procedures.
- b) The Whistleblowing Policy will cover issues which:
 - i. are believed to be unlawful,
 - ii. are against Wellspring policies and procedures,
 - iii. fall below established standards of practice,
 - iv. amount to improper conduct,
 - v. contravene the beliefs and ethos of the Charity.

4. Safeguards

4.1. Harassment or Victimisation

- a) It is recognised that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the malpractice.
- b) The charity will not tolerate harassment or victimisation and will take action to protect individuals who raise a concern in good faith.

4.2. Confidentiality

- a) Every effort will be made to protect the identity of individuals raising a concern who do not want their identity disclosed.
- b) It must be appreciated, however, that any investigation process may reveal the source of the information and a statement may be required later as evidence.

4.3. Anonymous Allegations

- a) Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Charity.
- b) In exercising this discretion, factors to be considered would include:
 - i. the seriousness of the issue raised,
 - ii. the credibility of the concern,
 - iii. the likelihood of confirming the allegation from attributable sources.

4.4. Untrue Allegations

- a) If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the complainant.
- b) If, however, an allegation is found to be malicious or vexatious, possibly out of spite or in order to pursue a private vendetta or retribution, disciplinary action may be taken against the complainant.

5. Procedure

5.1 Initial Complaint

- a) As a first step, concerns should be raised with the complainant's Line Manager.
- b) Depending, however, on the seriousness and sensitivity of the issues involved, and who is thought to be involved in the malpractice, it may be necessary to make the initial complaint to the Director of the Charity or the Chair of Trustees, or another Trustee if both the Chair and Director are subjects of the issue.
- c) All concerns should preferably be submitted in writing, setting out the background and history of the concern. Where possible, names, dates, places and reasons for the concerns should be outlined.
- d) Concerns should be expressed at the earliest opportunity to facilitate effective action.
- e) Individuals will not be expected to prove the truth of an allegation but will need to demonstrate to the person contacted that there are sufficient grounds for concern.

5.2 Initial Response

- a) The action taken will depend on the nature of the concern. The matters raised may:
 - i. Be investigated internally,
 - ii. Be referred to the Police,
 - iii. Form the subject of an enquiry by the relevant professional body, e.g. BACP or ACC.
- b) In order to protect individuals and Wellspring, initial enquires will be made to decide whether an investigation is appropriate and, if so, what form it should take.
- c) Concerns or allegations which fall within the scope of specific procedures (for example discrimination issues), will normally be referred for consideration under those separate procedures.

5.3 Investigation

- a) Notwithstanding para 5.1.a, a member of the management team together with the Director of the Charity will investigate the nature of the complaint in the first instance. Should the Director be involved in the Complaint it will be investigated by the Chair of Trustees and/or another Trustee.

Within ten working days of a concern being received, the complainant will be told:

- i. That the concern has been received,
 - ii. How the charity proposes to deal with the matter,
 - iii. Details of any initial enquiries.
 - iv. What further investigations will take place, and if none, why not.
- b) The amount of contact between the persons considering the issues and the complainant will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought from the complainant.
- c) When any meeting is arranged, the complainant has the option to be accompanied by a work colleague or friend who is not involved in the area of work to which the concern relates. Where appropriate, meetings can be arranged and held "off-site" to safeguard confidentiality.
- d) It is recognised that complainants will need to be assured that the matter has been properly addressed and, where appropriate, subject to any legal constraints, they will receive information about the outcome of any investigation.
- e) Once the investigation is complete a report will be made to the Trustees outlining the outcome and making recommendations as appropriate.
- f) Should the complainant not be happy with the result of the investigation advice will given about any further action open to them with regard to escalating the matter to external agencies.

5.4 Support

- a) All possible steps will be taken to minimise any difficulties experienced as a result of raising a concern. Individuals will be protected, as far as possible, from reprisals and victimisation.
- b) Individuals who are shown to exercise undue pressure on anyone to deter them from raising a concern about abuse or malpractice, will be subject to Wellspring's Disciplinary Procedure.

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