



**LIGHTHOUSE**  
FUTURES TRUST

# **Whistleblowing Policy**

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# LIGHTHOUSE FUTURES TRUST

## Whistleblowing Policy

*Lighthouse Futures Trust may be referred to in full or as LFT or the charity.*

### 1. Introduction and Objectives

- 1.1 LFT is committed to the highest possible standards of openness, probity and accountability. In line with that commitment we expect employees, and others that we deal with, to come forward and voice any serious concerns they might have about any aspect of our activities or those who work for the charity. It is recognised that most cases will have to proceed on a confidential basis.
- 1.2 The policy applies to all employees and those contractors working for the charity on its premises, for example, agency staff. It also covers suppliers and those providing services under a contract with the charity on their own premises.
- 1.3 The Whistleblowing policy does not cover a situation in which you wish to lodge a grievance or complaint relating to your own employment. Please see the charity Grievance Policy or Complaints policy for guidance

### 2. Control

- 2.1 This Policy is controlled by the Board of Trustees of the charity who reserve the right to alter its provisions. It will be reviewed **every three years** or as and when policies are changed, or new guidance is available.

### 3. Principles

- 3.1 Employees are often the first to realise that there may be something wrong within an organisation. Normally, they would be expected to raise any concerns initially with **their line manager** or the CEO. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the charity. They may also fear harassment or victimisation.
- 3.2 The aim of this policy is to make it clear that people can raise serious concerns within the charity without fear of victimisation, subsequent discrimination or disadvantage. This is preferable to overlooking a problem or *“blowing the whistle”* outside.
- 3.1 The aim of this policy is to:
  - Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice;
  - Provide avenues for you to raise concerns and receive feedback on any action taken;
  - Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;

- Re-assure you that you will be protected by the charity from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in good faith.

3.2 The Policy is intended to cover major concerns that fall outside, or in a particular instance do not appear to have been properly addressed within, the scope of other procedures. These include:

- Conduct which is an offence or a breach of the law;
- Disclosures related to miscarriages of justice;
- Health and safety risks, including risks to the public as well as other employees;
- Damage to the environment;
- The unauthorised use of public funds;
- Possible fraud and corruption;
- Sexual or physical abuse of staff or students;
- Child Protection concerns, or
- Other unethical conduct.

3.3 Any serious concerns about any aspect of the charity's provision or the conduct of colleagues/employees of the members of the Governing Body or others acting on behalf of the charity can be reported under the Whistleblowing Policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the charity subscribes to; or
- Is against the charity's Financial Regulations and/or policies; or
- Falls below established standards of practice; or
- Amounts to improper conduct.

#### **4. Safeguards and Confidentiality**

4.1 The charity is committed to good practice and high standards and wants to be supportive of employees.

4.2 LFT recognises that the decision to report a concern can be a difficult one to make especially for staff who are new to the charity. If what you are saying is true, or your suspicions are reasonable, you will have nothing to fear because you will be doing your duty to your employer and to those for whom you are providing a service. In fact, you may be making yourself vulnerable if you do not raise the alarm.

4.3 The charity will not tolerate or allow any form of harassment, victimisation or discrimination (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith. If there are any intimidatory threats or instances of harassment/victimisation/discrimination against a 'whistleblower' the charity will take appropriate disciplinary action against the individual(s) concerned.

4.4 Any investigation into allegations of potential malpractice will not influence or be influenced by any disciplinary or redundancy procedures that already affect you.

- 4.5 All concerns will be treated, as far as possible, in the strictest confidence and every effort will be made not to reveal your identity if you so wish. However, if your concerns require any further action, you may at some future date have to act as a witness and/or provide evidence.
- 4.6 We encourage you to put your name to your allegation whenever possible. Concerns expressed anonymously are much less powerful but will be considered at the discretion of the charity. In exercising this discretion, the factors to be taken into account would include:
- The seriousness of the issues raised;
  - The credibility of the concern; and
  - The likelihood of confirming the allegation from attributable sources.
- 4.7 If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

## **5. How to raise a concern**

- 5.1 As a first step, you should normally raise concerns with the CEO. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if you believe that the CEO is involved, you should approach the Chair of Trustees.
- 5.2 Concerns should be raised in writing. Staff who wish to make a written report are invited to use the attached Form WB1 at Appendix 1 which enables you to identify:
- The background and history of the concern (giving relevant dates);
  - The reason why you are particularly concerned about the situation;
- 5.3 The earlier you express the concern the easier it is to take action.
- 5.4 Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.
- 5.5 You may wish to consider discussing your concern with a colleague or your Trade Union Representative, if appropriate first as you may find it easier to raise the matter through someone you trust.
- 5.6 You may invite your trade union, or a colleague to be present during any meetings or interviews in connection with the concerns you have raised.

## **6. How the charity will respond**

- 6.1 The charity will respond to your concerns. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.
- 6.2 The charity will maintain a record of concerns raised and the outcomes (but in a form which does not endanger your confidentiality).

- 6.3 Where appropriate, the matters raised may:
- Be investigated by appropriate representatives, internal audit, or through the disciplinary process;
  - Be referred to the Police;
  - Be referred to the external auditor;
  - Form the subject of an independent inquiry (See Appendix 2)
  - or a combination of these
- 6.4 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle which the charity will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, child protection, adult abuse or discrimination issues) will normally be referred for consideration under these procedures.
- 6.5 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.
- 6.6 Every effort will be made to ensure that your concerns are dealt with as speedily as possible, and you are kept informed of progress made. Within ten working days of a concern being raised, the CEO (unless the circumstance outlined in section 7.1 applies) will write to you in confidence:
- Acknowledging that the concern has been received;
  - Indicating how it is proposed to deal with the matter;
  - Giving an estimate of how long it will take to provide a final response;
  - Telling you whether any initial enquiries have been made;
  - Supplying you with information on staff support mechanisms, and
  - Telling you whether further investigation will take place and if not, why not.
- 6.7 The amount of contact between the staff considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the charity will seek further information from you.
- 6.8 Where any meeting is arranged, off-site if you so wish, you can be accompanied by a trade union representative or a colleague.
- 6.9 The charity will take steps to minimise any difficulties which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the charity will arrange for you to receive advice about the procedure.
- 6.10 The charity accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

## 7. HOW THE MATTER CAN BE TAKEN FURTHER

7.1 Employees are entitled to contact the charity Public Concern at Work for confidential advice on whistleblowing issues: 3<sup>rd</sup> Floor, Bank Chambers, 6-10 Borough High Street, London SE1 9QQ. Tel: 020 7204 6609. [www.pcaw.org.uk](http://www.pcaw.org.uk).

7.2 This Policy is intended to provide you with an avenue within the charity to raise concerns. The charity hopes you will be satisfied with any action taken. If you are not, and if you feel it is right to take the matter outside the charity, the following are possible contact points, (this list is not exhaustive):

- Department for Education
- National Audit Office
- The Health and Safety Executive
- The Financial Services Authority
- H M Customs and Excise
- The Inland Revenue
- The Police
- The District Auditor
- The Ombudsman

7.3 If you do take the matter outside the charity, you should ensure that you do not disclose confidential information. If possible, it is advisable to check with the CEO before disclosing any information.

**WHISTLEBLOWING ALLEGATION FORM**

**FORM WB1**

**Name** .....

**WHAT CONCERN(S) DO YOU WISH TO RAISE?**

(In your own words describe your concern(s), include date(s), time(s), persons involved, including any witnesses, location, the length of time you have been concerned.)

**WHY ARE YOU CONCERNED ABOUT THE ISSUE(S)?**

**HAVE YOU DISCUSSED THE ISSUE(S) WITH ANYONE ELSE? YES/NO**

IF SO, who with ..... WHEN (*date*) .....

**WHAT WAS THE OUTCOME OF THIS PREVIOUS DISCUSSION?**

SIGNED ..... DATE .....

ON COMPLETION THIS FORM SHOULD BE SENT TO THE CEO OR CHAIR OF TRUSTEES IN A SEALED ENVELOPE MARKED PRIVATE AND CONFIDENTIAL