

Adopted: July 2019
Reviewed: January 2025

WHISTLEBLOWING POLICY (Public Disclosure)

PURPOSE

Age UK Cambridgeshire & Peterborough (AUKCAP) is committed to the highest standards of quality, integrity, openness and accountability.

We want to ensure that all those who work or volunteer for AUKCAP can raise concerns about safety, malpractice and misconduct relating to our work, with the assurance that we will take their concerns seriously and that they will be treated with respect and fairness.

RELATED POLICIES

The purpose of this policy is to explain the routes available to appropriately raise concerns about our work that are in the public interest. This policy is intended to provide guidance only and does not form part of your contract of employment.

It overlaps with other organisational policies and procedures. Depending on your role in the organisation, these can be found in:

- **Our staff handbook-** If you wish to make a complaint about your employment, or the way that you have been treated as an employee, please refer to our grievance, disciplinary, and our bullying and harassment policies in our staff handbook.
- **Our Volunteer Handbook-** If you are a volunteer and wish to raise a complaint about the way you have been treated as a volunteer, please refer to our complaints procedure in our volunteer handbook.

BACKGROUND

This policy is underpinned by **The Public Interest Disclosure Act 1998 (PIDA)**, which protects 'whistleblowers'- who make disclosures in the public interest- from negative treatment or unfair dismissal.

This Act covers qualifying disclosures, including:

- A criminal offence;
- Failure to comply with a legal obligation;
- A miscarriage of justice;
- Endangering of someone's health and safety;
- Damage to the environment; and
- Covering up wrongdoing in the above categories.

As an employee or volunteer, if you have a concern that relates to the issues above, it can be difficult to know what to do. The leadership team and Board of Trustees are committed to running AUKCAP in the best possible way and are reliant upon those working and volunteering with us to raise concerns so that they can be addressed. We encourage you to raise any concerns with us as soon as possible.

HOW TO RAISE CONCERNS

Step one- If you have a concern about a risk, poor practice or wrongdoing in the course of your work or volunteering, we hope that you feel able to raise it with your line manager or key contact.

Step two- If for any reason you feel unable to raise the matter with your line manager or key contact, please raise your concern with our Chief People Officer (CPO) or Chief Executive (CEO).

Samantha Burton (CPO) 07967310001
Email: Samantha.Burton@ageukcap.org.uk

Melanie Pittock (CEO) 07538792909
Email: Melanie.Pittock@ageukcap.org.uk

Step three- If you have tried to raise your concerns via the above channels, or if you feel that the concern is so serious that you cannot raise it with the contacts above, please contact our Chair of Trustees. Emails should be sent marked 'P&C for Chair of Trustees' to admins@ageukcap.org.uk. Please state that you are raising a concern under this policy, and if you would like your identity to be kept confidential.

Raising an anonymous concern- Anonymous disclosures should be sent by post to:

Private & Confidential to the recipient and sent to Age UK CAP, Frans House, Fenton Way, Chatteris, Cambridgeshire, PE16 6UP.

Please note that it can be difficult to fully investigate anonymous disclosures, as we cannot contact the person who raised them for clarification and further information. Raising a concern anonymously also makes it more difficult to provide feedback to you on our investigation, and to protect you from adverse treatment.

Confidentiality- In accordance with our confidentiality policy, we will not reveal your identity without your consent unless required by law. However, there may be occasions where it is difficult to resolve a concern without revealing who you are (for example, if your personal evidence is crucial to the investigation). In such circumstances, we will discuss this with you and agree together how to proceed.

Raising concerns externally- While we hope that you will feel confident in raising your concerns to us, we would prefer that you raise your concerns with an appropriate regulator than not at all.

The Public Interest Disclosure (Prescribed Persons) Order 1999 lists regulatory bodies to whom protected disclosures may be made. These include the Data Protection Registrar, the Environment Agency, The Charity Commission and the Health and Safety Executive. Please click [here](#) for a full list.

Accessing advice and support- If you are unsure about whether to use this policy, or want confidential advice at any stage, you may wish to contact the independent charity PROTECT, www.protect-advice.org.uk on 020 3117 2520. Their lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work.

If you are a member of a trade union, you may also wish to seek their advice on how to proceed. You can be accompanied by a trade union representative or a AUKCAP colleague to any meetings that take place under this policy.

HOW WE WILL HANDLE CONCERNS RAISED

AUKCAP is committed to investigating concerns raised fully, fairly, quickly, and confidentially where circumstances permit.

Step one- If you raise your concerns informally with your line manager or key contact, they will listen carefully to your concerns and may ask you for further information, or to confirm your concern in writing. They will also inform and seek advice from the CPO, CEO or Board of Trustees, as appropriate in the circumstances.

It may be possible to address your concerns informally, or if they are more serious, they will be escalated to the CPO, CEO or Board of Trustees for further investigation.

Step two- If you raise your concern directly with the CPO, CEO or Board of Trustees- or if your line manager/ key contact has escalated it to them for a formal investigation- we will acknowledge receipt within 5 working days and arrange for an appropriate investigation.

The length and scope of the investigation will depend on the nature of the concerns raised. In most instances, we will carry out an initial assessment of your concern to determine whether there are grounds for a more detailed investigation.

Sometimes this initial assessment of your concern will result in a recommendation of 'no further action' (perhaps there was a misunderstanding, or the concern can most effectively be managed under other policies, such as our disciplinary policy). Other times there will be a recommendation of further investigation internally or externally (e.g. a police investigation). In any event, a written report of your concern and our investigation/ next steps will be shared with the Board.

Step three- If a longer investigation is considered necessary, we will usually appoint an investigative team, with specialist knowledge of the subject matter of the disclosure or refer the matter to an external body (such as the police). Separate personnel will be asked to make a judgment on the report submitted by the investigative team.

Recommendations for change will also be invited from the investigative team to enable us to minimise the risk of the recurrence of any malpractice or impropriety which has been uncovered. The board will then be responsible for reviewing and implementing these recommendations.

OUR COMMITMENT TO YOU

To look after your wellbeing- We want to stress that any volunteer or employee, who raises a genuine concern under this policy, will not be at risk of losing their job or volunteer role for doing so, and will be protected from any further detriment (e.g. reprisal or victimisation).

If you are acting honestly when you raise a concern, it will not matter whether you are mistaken, or whether there is an innocent explanation for your concerns. However, if you are found to have maliciously raised a concern that you know not to be true, this will be investigated under our disciplinary policy.

Please let us know if you believe that you have been negatively affected by raising your concern, and we will investigate this under our grievance policy.

To keep you informed- As far as possible, within the limits of the law and without infringing on our duty of confidentiality to others, we will keep you informed as each stage of the investigation progresses. If you are dissatisfied with the investigation or its conclusion, then you should write directly to the Chair of Board of Trustees detailing your concerns.

MONITORING AND REVIEW OF POLICY

The Board of Trustees is responsible for monitoring and reviewing the operation of the policy. This policy will be reviewed annually.

Whistleblowing policy approved: February 2025



Signed by Chair of Trustees