

WHISTLEBLOWING POLICY

This policy applies to all staff, volunteers and trustees.

We are committed to conducting our business with honesty and integrity. Should anyone have concerns that our conduct has been dangerous, against the law or we have breached ethical or professional codes, these concerns should be reported. All concerns raised will be taken seriously, acted upon promptly and investigated thoroughly, with every attempt made to resolve through internal procedures. Whistleblowers may be internal or external (service users, local authorities, external agencies etc.).

Whistleblowing policy should be used to report the following:

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law or there may be a failure to comply with legal or regulatory obligations, e.g. company doesn't have the right insurance
- you believe someone is covering up wrongdoing or attempting to conceal one or more of these activities
- breaches our policy on bribery and corruption
- a failure to meet professional requirements
- relates to 'serious complaints', e.g. including safeguarding or child protection

Also refer to our Children and Adult Safeguarding Procedures.

Complaints that do not count as whistleblowing

- Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law. Report these under the Grievance policy.

How to raise a concern

Concerns should be raised with the Managing Director. However, where the Whistleblower prefers not to raise it with the Service Manager for any reason, the Chair of the Board should be contacted. Contact details are at the end of this policy.

Process

A meeting will be arranged as soon as possible to discuss the concern. The Whistleblower may bring a colleague to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

Employees should avoid any form of external communications regarding any reports unless internal investigations have been completed and all internal alternatives have been exhausted.

Employees are encouraged not to make anonymous reports as it can hinder or complicate investigations and possibly prevent appropriate action from being taken. However, if the employee feels there is no other option this can be done.

Unless the report was made anonymously, and unless otherwise inappropriate, the employee making the report will be informed of the status of the report. However, the level of detail provided will be at the discretion of SRC as to what is deemed appropriate.

If unsatisfied with how the report was handled, or if the issue remains unresolved, the employee can resubmit their report at a more senior level or, where no higher level is available, can report externally to a relevant body.

Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Employees that report concerns or participate in any investigations under this procedure in good faith are protected from any victimisation as a result of doing so under the Public Interest Disclosure Act (1998).

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that such treatment has been suffered, the Whistleblower should inform the Chair of the Board immediately. If the matter is not remedied it should be raised formally using our Grievance Procedure.

There must be no threats or retaliation against whistleblowers in any way. If anyone is involved in such conduct, they may be subject to disciplinary action. In some cases the whistleblower could have a right to sue personally for compensation in an employment tribunal.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

1.1 Contacts

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| Service Manager | Debbie Sangster Debbie.sangster@compasscentre.org 11 Hill Lane, Lerwick, ZE1 0QH |
| Chair Person | Tori Johnson/Lucy Livingstone Email – board@compasscentre.org c/o 11 Hill Lane, Lerwick, ZE1 0QH |
| Protect (formerly Public Concern at Work) | https://protect-advice.org.uk tele: 020 3117 2520 |
| Office of Scottish Charity Regulator (OSCR) | info@oscr.org.uk tele: 01382 220446 |

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