

THE HUB – WHISTLEBLOWING POLICY AND PROCEDURE

Date of Policy: April 2025

Date of Review: April 2026

Date of next review: April 2027

Introduction

The Hub is committed to conducting its business with honesty, integrity and transparency. All staff are expected to maintain high standards in accordance with their contractual obligations and the organisation's policies and procedures. This policy reflects current organisational practice and applies to every individual working for The Hub, regardless of status, level or grade. It therefore includes directors, employees, consultants, contractors, trainees, volunteers, home-workers, part-time or fixed-term employees, casual staff and agency workers. All staff are expected to familiarise themselves with the content of this policy.

The Hub recognises that all organisations face the risk of things going wrong or of unknowingly harbouring illegal or unethical conduct. A culture of openness, accountability and transparency is essential to prevent such situations or to address them promptly when they occur. This policy supports that culture and ensures that staff can raise concerns safely and appropriately.

Aim of the Policy

The purpose of this policy is to encourage staff to report suspected wrongdoing as soon as possible, with the assurance that concerns will be taken seriously, investigated appropriately and treated confidentially. Staff are provided with clear guidance on how to raise concerns, and they are reassured that genuine concerns may be raised without fear of reprisals, even if they turn out to be mistaken. This policy does not form part of any employee's contract of employment and is not intended to have contractual effect. It is provided for guidance and may be amended at any time.

What is Whistleblowing?

Whistleblowing is the disclosure of information relating to suspected malpractice, wrongdoing or dangers at work. This may include criminal activity, safeguarding or child protection concerns, miscarriages of justice, dangers to health and safety, environmental damage, failure to comply with legal or professional obligations, financial fraud or mismanagement, negligence, breaches of internal policies including the Code of Conduct, conduct likely to damage The Hub's reputation, unauthorised disclosure of confidential information, or deliberate concealment of any such matters.

A whistleblower is someone who raises a genuine concern that they believe is in the public interest. Staff who have concerns relating to suspected wrongdoing or danger affecting any of The Hub's activities should report them under this policy. Concerns relating to an individual's own employment or personal circumstances should be raised through the complaints procedure instead. Staff who are uncertain whether an issue falls within the scope of this policy should seek advice from the Directors.

Confidentiality

The Hub encourages staff to voice concerns openly. However, if a staff member wishes to raise a concern confidentially, The Hub will endeavour to keep their identity secret as far as possible. If investigators need to know the whistleblower's identity, this will be discussed with the individual first. If disciplinary or other proceedings follow, it may not be possible to take action without the whistleblower's involvement, and they may be asked to act as a witness. Support will be offered in such circumstances.

Anonymous concerns may be raised, but they are more difficult to investigate and verify. The Hub will consider anonymous concerns at its discretion, taking into account the seriousness of the issue, the credibility of the concern and the likelihood of confirming the allegation from other sources. Staff who fear reprisals should raise their concerns with one of the designated contacts so that appropriate measures can be taken to preserve confidentiality.

Staff may seek independent advice from Protect, the whistleblowing charity, which provides confidential guidance.

Raising a Whistleblowing Concern

The Hub hopes that concerns can often be raised with a Line Manager, either in person or in writing. Together, staff and managers may be able to resolve concerns quickly and effectively. Concerns relating to poor or unsafe practice or failures in safeguarding should be raised initially with the Line Manager. If the matter is more serious, if the Line Manager has not addressed the concern, or if the staff member prefers not to raise it with them, the concern should be reported to the Directors.

Staff should provide information about the nature of the concern, why they believe it to be true, and any relevant background or dates. The Directors will arrange a meeting as soon as possible to discuss the concern. Staff may bring a colleague or

trade union representative to any meeting, and confidentiality must be respected by all parties. A written summary of the concern will be provided after the meeting, along with an indication of how the matter will be handled.

Investigation and Outcome

Following the meeting, The Hub will carry out an initial assessment to determine the scope of any investigation. Staff may be required to attend further meetings to provide additional information. In some cases, an investigator or team of investigators may be appointed, including individuals with relevant experience or specialist knowledge. External investigators may be used where appropriate. Investigators may make recommendations to minimise future risks.

The Hub will aim to keep staff informed of progress and timescales, although confidentiality may limit the detail that can be shared. Staff must treat all information relating to the investigation as strictly confidential. If it is concluded that a whistleblower has made false allegations maliciously or for personal gain, disciplinary action may be taken.

If You Are Not Satisfied

The Hub aims to deal with concerns fairly and professionally. If a staff member is dissatisfied with how their concern has been handled, they may raise it with another key contact.

External Disclosures

This policy provides an internal mechanism for reporting, investigating and remedying wrongdoing. The Hub expects that concerns will normally be raised internally. However, the law recognises that in some circumstances it may be appropriate to report concerns to prescribed external bodies, such as regulators or professional organisations. Staff should seek advice before reporting concerns externally. Protect provides confidential guidance and maintains a list of prescribed bodies.

Where concerns relate to safeguarding practices and staff feel unable to raise them internally or are dissatisfied with how they have been handled, they may contact the NSPCC whistleblowing advice line.

Concerns may sometimes relate to third parties such as service providers. In some circumstances, the law protects staff who raise concerns directly with the third party, although internal reporting is encouraged.

Protection and Support for Whistleblowers

The Hub is committed to supporting staff who raise genuine concerns. Staff must not suffer detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment. Staff who believe they have suffered such treatment should inform the Proprietor. If unresolved, the matter may be raised formally through the complaints procedure.

No staff member may threaten or retaliate against a whistleblower. Harassment or victimisation will result in disciplinary action. Staff who raise concerns frivolously, maliciously or for personal gain, or who make allegations they do not reasonably believe to be true or in the public interest, may also face disciplinary action.

Disciplinary Procedures

The Hub has developed disciplinary procedures to provide clear and transparent structures for addressing difficulties in the working relationship. These procedures ensure that issues are dealt with fairly and equitably. The Hub aims to resolve issues informally where possible, but where this is not achievable, a formal process will be followed.

A full investigation will normally take place before disciplinary action is considered. Matters will be kept confidential. Staff will be notified in writing if disciplinary action is being considered and provided with relevant evidence. Staff may be accompanied at meetings by a colleague or trade union representative.

Suspension on normal pay may occur where an offence is considered potential gross misconduct. Staff will have the opportunity to explain their version of events and present evidence. Decisions will be made only after careful consideration of all information.

Outcomes may include no action, warnings, dismissal or demotion, depending on the circumstances. Staff will be notified in writing of the decision within a reasonable timeframe. Staff have the right to be accompanied at all formal stages and appeal meetings. Records of meetings and evidence will be kept on personnel files.

Warnings will normally be issued in line with organisational guidelines, although mitigating factors may influence decisions. Staff may be dismissed without previous warnings depending on length of service and severity of misconduct.

Further Information

Protect provides free, confidential whistleblowing advice and can be contacted online or by telephone. All staff are responsible for the success of this policy and should use it to disclose suspected danger or wrongdoing. Staff are invited to comment on the policy and suggest improvements. Comments, suggestions and queries should be addressed to the Proprietor.