



Whistleblowing Policy

Approved on: 5th July 2024

To be reviewed by: July 2027

Signed:

A handwritten signature in blue ink, appearing to read "M. Moran".

Position: Trustee

Signed:

A handwritten signature in blue ink, appearing to read "J. Reilly".

Position: Trustee

What is Whistle-Blowing?

The Public Interest Disclosure Act of 1998 encourages employees not to turn a blind eye to what they suspect might be malpractice or illegal acts and omissions within their organisation, but to report it without fear of recrimination. This is called "whistle-blowing".

This policy sets out guidelines for staff who may wish to report concerns about issues in the work place. It enables staff to raise any concerns about malpractice within the organisation at an early stage and in the right way. Eagle's Nest would rather that a member of staff raised the matter when it is just a concern than wait for proof. This would be in the best interests of clients and staff in the longer term.

This Whistle-blowing Policy is primarily for concerns where the interests of others or of the organisation itself may be at risk.

Some examples of such concerns could include:

- Any of the areas outlined in the Safeguarding policy
- Malpractice, be it a danger to you, to our students, or to the public generally; i.e. a situation in which a member of staff is suspected of abusing trust in any way
- Financial malpractice
- Any unlawful conduct or breach of legal obligations we owe to others
- Danger to health and safety
- Breach of Equal Opportunities Policy
- Damage to the environment
- Deliberate covering up of information tending to show any of the above

Eagle's Nest is committed to dealing responsibly, professionally and confidentially with any genuine concern a member of staff may have about any such issues, and will ensure that, where a member of staff acts in good faith, they will suffer no discrimination or victimisation as a result of raising a genuine concern about malpractice. This is true, even if the concern later proves to be unfounded.

If a member of staff has a suspicion or accusation of malpractice regarding another member of staff, Eagle's Nest encourages him/her to make this known. It may be clear that an incident has occurred, it may be disputed, or it may simply be a suspicion. In **all** cases, whether or not there is evidence and regardless of the natural loyalty we owe each other, this **must** be acted upon in one of the ways outlined below.

What should a member of staff do if there is a concern?

Option 1. If the staff member feels comfortable to do so, they should raise the concern with their line-manager, either verbally or in writing. The line-manager should consult with the Chair of Trustees and make a record of incidents, allegations and resulting actions.

Option 2. If the staff member feels unable to raise the matter with the line manager, for whatever reason, then they may report the concern confidentially to the Chair of Trustees who may speak with them in person.

Eagle's Nest Management will take action as they deem appropriate. If the incident or allegation is sufficiently serious the 'No Secrets' protocol will be followed. Any action taken will be recorded with reasons given. The staff member's identity, as the whistleblower, should as far as possible remain confidential.

Incidents, allegations and resulting actions must be recorded in writing.. Eagle's Nest Management will keep such records in a secure file, not accessible to staff. Along with this form should be kept copies of other relevant documents, such as copies of letters of warning, letters or reports to police, notes of meetings with any relevant authority; or replies and responses to any of these.

These records should be used in every case of an allegation being made or an incident occurring, regardless of the opinion of Eagle Nest as to the presence or absence of the alleged malpractice. The purpose is to guard against the possibility of serious malpractice by providing a trace of the warning signs and decisions made *en route*.

Where it is clear that a 'serious' incident has taken place, this must be passed to the Chair of Trustees.

Option 3. There may be circumstances in which a member of staff is uncomfortable with options 1-2. If this is the case, and the concerns are of a serious nature then the staff member may report this externally to any of the following organisations:

- **Police**, if a matter of a criminal nature is suspected: Telephone 0116 222222, or call at the Police Station and ask to speak to an officer in confidence.
- **The Charity Commission**, if a worker reasonably believes that the relevant failure relates to 'the proper administration of charities and funds given, or held, for charitable purposes'.
- **Public Concern at Work**, a national independent charity providing advice on whistleblowing (see <https://protect-advice.org.uk/>); telephone 020 7404 6609

Reminder: One of these options **must** be followed if a member of staff has a real concern.