



OVER THE WALL

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WHISTLEBLOWING POLICY & PROCEDURES

POLICY STATEMENT

We are committed to conducting our business in a responsible way and to ensuring that we safeguard the interests of our stakeholders.

The purpose of this Policy is to encourage all stakeholders to raise legitimate concerns in a responsible way where they believe that there has been some form of malpractice.

Policy Date: August 2021

By: Kevin Mathieson CEO

Status: Live

Adopted: April 2014

Review: 2023

WHISTLEBLOWING POLICY & PROCEDURES

1. *General principles*

- 1.1. Concerns should only be raised in good faith and should not be raised to further a personal grievance or private dispute (where appropriate, such matters should be dealt with through our grievance procedure).
- 1.2. Victimising employees, volunteers, or any person who makes a disclosure or deterring them from raising a genuine concern about fraud, corruption, malpractice or unethical conduct will constitute a serious disciplinary offence.
- 1.3. Abuse of this procedure by employees by maliciously or mischievously raising unfounded allegations, either internally or externally, will be regarded as a serious disciplinary offence.
- 1.4. Where an allegation is made, the person or persons against whom the allegation is made shall be informed of the allegation and the evidence supporting it and shall be allowed to comment before the investigation is completed.
- 1.5. Any allegation of malpractice shall be treated in the strictest confidence and investigated immediately. The identity of the individual raising the complaint shall not be disclosed to the alleged perpetrator of malpractice without that individual's prior approval, unless this is incompatible with a fair investigation. You will be informed of the need to disclose your identity in any event.
- 1.6. Any disclosure made under this Policy must be in good faith. If you make an allegation you must have a reasonable belief that the allegation is true, and it must not be made for personal gain.

2. *Procedure*

- 2.1. If you are an employee and the allegations relate to a matter which you could raise as a grievance you may if you wish raise them as a grievance following the grievance procedure set out in Employee Handbook. Alternatively, you should follow the procedure below.
- 2.2. This procedure applies to the following allegations:
 - that a criminal offence has been, is being, or is likely to be committed;
 - that a person has failed, is failing, or is likely to fail to comply with any legal obligation to which they are subject;
 - that a miscarriage of justice has occurred, is occurring, or is likely to occur;
 - that the health and safety of any individual has been, is being, or is likely to be endangered;
 - that the environment has been, is being, or is likely to be damaged;
 - that information tending to show any matter falling within one of the above categories has been, is being, or is likely to be deliberately concealed.
- 2.3. In the first instance, you should make any allegation covered by this procedure in writing to the Chief Executive, stating clearly that you are making an allegation under the protection of the Whistleblowing procedure.
- 2.4. A record will be made of receipt of the disclosure and we will either arrange for an appropriate member of the senior management team to investigate the disclosure or another appropriate independent person.
- 2.5. Once the investigation is completed, we will inform you, subject to any third-party rights, of the outcome of the investigation.
- 2.6. If you have any concerns or complaints about the manner in which you feel you are being treated because you made the disclosure, whether by the alleged wrongdoer or by any colleagues, you should raise this with a member of the senior management team and it may be dealt with as a disciplinary matter in relation to such individuals.
- 2.7. If you are dissatisfied with the outcome of the investigation or feel unable to report it to the Chief Executive in the first instance, disclosure should be made in writing to the Chair of

Trustees, who will investigate the matter and report back to the individual. The decision of the Chair of Trustees will be final.

3. Review

- 3.1. This policy will be reviewed biennially for currency and accuracy by the CEO or individual delegated by him/her. This does not prevent any changes taking place to this policy at any other time due to changes in practice or legislation.