



## Building Bridges Whistleblowing Policy

### 1. Policy Statement

The Building Bridges Partnership will not condone any form of malpractice in the delivery of the programme and is committed to creating a safe, fair and honest environment for those employed in the delivery of the programme and our participants.

The Building Bridges Partnership's Whistleblowing policy encourages and enables those employed in the delivery of the programme and our participants to speak out when they encounter or suspect malpractice.

No one who raises a genuine concern about malpractice will be at risk of losing their job or suffering any other form of retribution or detriment as a result of doing so, including harassment or victimisation.

This Policy applies to all those employed in the delivery of the programme and our participants.

We recognise that individual organisations within the Building Bridges Partnership will have their own Whistleblowing Policies and this Policy is intended to operate in conjunction with these in matters relating to the delivery of the Building Bridges Programme.

### 2. Principles

2.1 If a person has any concerns regarding the behaviour of others in relation to the delivery of the programme (including illegal, improper or unethical acts), they can take confidential action to raise their concerns.

2.2 The person raising the concerns will be protected from any detriment if:

- they raise a genuine concern in accordance with the procedures set out below
- it is made in the public interest
- they have a reasonable belief that the behaviour in question is occurring, has occurred, or is likely to occur.

2.3 If the person's concerns relate to the delivery of the programme by one of our partner organisations, they should first try to resolve the matter through the policies and procedures (including Whistleblowing) of that partner organisation.

2.4 If the person feels that they are unable to resolve their concerns through the policies and procedures of the relevant partner organisation, or they feel it relates to the wider delivery of the Building Bridges Programme, they should raise their concerns in accordance with this policy.

2.5 All concerns will be treated in confidence and every effort will be made not to reveal anyone's identity in so far as this is consistent with the proper examination and investigation of the matter. If it is necessary to reveal a person's identity, this will be discussed with them at the earliest possible stage before any further action is taken.



### 3. Before Taking Action

- 3.1 We would ask that people do not disclose confidential information or concerns relating to the delivery of the Building Bridges Programme or the partner organisations' businesses without first raising them in accordance with the procedures set out in this policy.
- 3.2 Individual partner organisations already have procedures in place for employees to raise personal employment-related grievances. This policy complements, but does not replace those existing partner organisation procedures.
- 3.3 A protected disclosure is different to a grievance in that it will concern the conduct of another person in the workplace (whether or not that conduct affects the complainant personally) in circumstances where the complainant genuinely believes that the conduct in question amounts to a criminal offence, a breach of a legal obligation, or something likely to endanger health or safety or damage the environment.
- 3.4 If a person has concerns relate to the quality of delivery of the programme by one of our partner organisations, they should first try to resolve the matter through the complaints procedure of that partner organisation. If the person feels that they are unable to resolve their concerns through the complaints procedure of the relevant partner organisation, or they feel it relates to the wider delivery of the Building Bridges Programme, they should raise their concerns in accordance with the Community First complaints procedure.

### 4. Matters of Concern

- 4.1 To be protected by the Whistleblowing Policy, the person raising the concern needs to make a 'qualifying disclosure' about alleged or actual malpractice. This could be:
- That a criminal offence has been committed, is being committed 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 he is subject or has failed, is failing or is likely to fail to uphold professional standards or practice and/or behaviour
  - That the health and safety of an individual is being or is likely to be endangered
  - That the environment has been, is being or is likely to be damaged
  - That a miscarriage of justice has occurred, is occurring or is likely to occur
  - That a person or organisation is receiving or has received unlawful bribes, financial incentives or inducements for personal gain or that they are involved (or generally suspected of being involved) in fraud
  - That information on any of the above has been, is being or is likely to be concealed.
- 4.2 For the disclosure to be protected by the law it should be made to the right person and in the right way. The person raising the concern must reasonably believe that the information is substantially true.



4.3 Anyone wishing to raise a concern is encouraged to put their name to their allegation. Anonymous disclosures are less powerful and more difficult to investigate, but will be considered in the context of the following:

- The seriousness of the disclosure
- The credibility of the concern
- Fairness to the individual or organisation that may be the subject of the concern raised
- Whether there is a likelihood that the allegation can be confirmed using reliable sources

## 5. Informal Procedure

5.1 If a person has a concern about wrong doing under any of the categories listed at paragraph 4.1 above, they can initially seek to resolve the matter informally and in confidence. The person can contact either the Building Bridges Programme Manager or the Independent Chair of the Building Bridges Strategic Partnership Group.

5.2 The person should set out their concerns and the reasons why they are a matter of public interest. The Building Bridges Programme Manager or the Independent Chair of the Building Bridges Strategic Partnership Group will promptly consider whether there is substance in the concerns and if so how they can be resolved, where necessary seeking advice.

5.3 There will be no record made of informal concerns or any reference to them on official files etc., including any action taken to address them.

## 6. Formal Procedure

6.1 If the person believes that the matter of concern is of a more serious nature, and/or that it cannot be or has not been resolved satisfactorily through the informal procedure, they can raise it formally (verbally or in writing) and in confidence with the Building Bridges Programme Manager or the Independent Chair of the Building Bridges Strategic Partnership Group.

6.2 The Building Bridges Programme Manager or the Independent Chair of the Building Bridges Strategic Partnership Group will meet with the person as soon as possible to ascertain the details of their concern. The person may be accompanied by a friend, work colleague or trade union representative at the meeting. The person will be asked if they want to disclose their identity. If the person does not wish to make a written statement the Building Bridges Programme Manager or the Independent Chair of the Building Bridges Strategic Partnership Group will write a brief summary of the meeting. The person will be given an opportunity to comment on the note, which should be agreed by both parties.

6.3 It may be necessary for the Building Bridges Programme Manager or the Independent Chair of the Building Bridges Strategic Partnership Group to carry out an investigation, make an objective assessment of the concern and determine the appropriate actions to be taken.



- 6.4 In some cases the Building Bridges Programme Manager or the Independent Chair of the Building Bridges Strategic Partnership Group may refer the matter to the senior management within partner organisations where this is necessary to ensure appropriate resolution of the concern in accordance with the organisational procedures.
- 6.5 If the resolution of the concern does not lie within the authority of the Building Bridges Partnership to resolve, the Building Bridges Programme Manager or the Independent Chair of the Building Bridges Strategic Partnership Group may refer the matter to the Big Lottery Fund Funding Officer.
- 6.6 The person raising the concern will be advised of progress and of the outcome of their complaint. Although it may not always be possible to provide the person with a full account, as much information as possible will be provided about the actions taken to deal with their cause for concern.
- 6.7 It will not be possible to protect a person's anonymity if they discuss the case with others outside the investigation.

## 7. Appeals Procedure

- 7.1 Anyone raising concerns under this Policy has the right to appeal against the outcome of the original investigation in accordance with the organisational procedures. If still unsatisfied then the Big Lottery Fund Funding Officer should be informed and details of how to do this will be included in the Building Bridges outcome letter.
- 7.2 The appeal should indicate the full grounds upon which it is made and must be sent in writing to the Big Lottery Fund Funding Officer within seven working days of receipt of the original investigation decision letter.
- 7.3 The Big Lottery Fund Funding Officer will then investigate the concerns raised in line with the Big Lottery Fund's policies and procedures.

## 8. Key Contacts

The key contacts for concerns to be raised through this policy are:

Position	Name	Email Address	Telephone Number
Building Bridges Programme Manager	Dave Potts	dpotts@communityfirst.org.uk	01380 732826 07738 883186
Independent Chair of Strategic Partnership Group	Jon Yates	Jon.Yates@wiltshirecf.org.uk	01380 729284 07813 044172
Big Lottery Fund Funding Officer	John Dewing	john.dewing@biglotteryfund.org.uk	0191 376 1902



## 9. Policy Review

This policy will be reviewed by the Building Bridges Partnership on at least an annual basis to incorporate any operational or legislation changes.

## 9. Amendment History

Version	Date	Comments
Draft	08/05/17	Draft issued for comment
1.0	20/07/17	Version 1.0 Adopted

Issued by:

Name: Dave Potts  
Position: Building Bridges Programme Manager

Signature:  
Date: