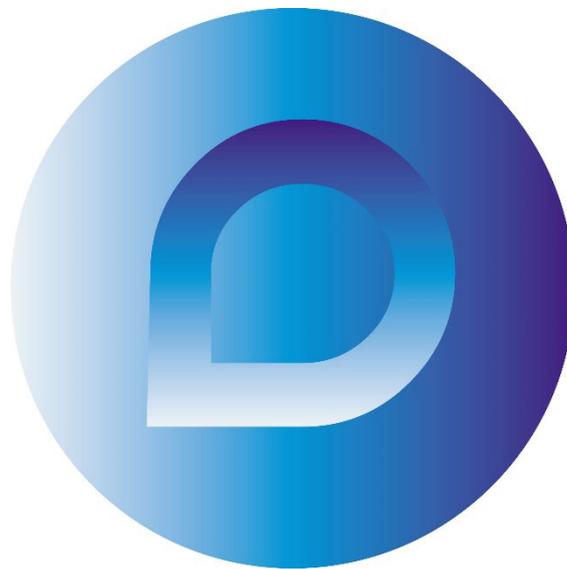


NCS Whistleblowing Policy



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NCS Whistleblowing Policy

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1.0 Introduction

In this policy 'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts or failure to act within the By Design Group Ltd and associated companies.

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the By Design Group Ltd and associated companies work to come forward and voice those concerns.

2.0 Policy Context

Everyone involved in activities carried out under permission, supervision or directly undertaken by the By Design Group Ltd and associated companies is covered by this policy.

The BDG will review its NCS Whistleblowing Policy on an annual basis and check that it and its staff and associates, where appropriate, are adhering to the policy.

3.0 Policy Aim

This policy will set out how individuals can raise concerns particularly about the safety and welfare of children, young people and vulnerable adults involved in the By Design Group Ltd and associated companies (BDG for future reference in this document) activities. There may also be issues around equality or discrimination matters that raise concerns. However, the principles also cover all other aspects of malpractice by individuals, within the BDG.

It will provide a method of raising concerns and how they can receive feedback on any action taken. BDG will ensure individuals will:

- a) Receive a response to their concerns.
- b) Be made aware of how to pursue the concern further if they are not satisfied with the response.
- c) Be re-assured that individuals will be protected from reprisals or victimisation for whistleblowing in good faith.

4.0 Whistleblowing

Staff and volunteers are often the first to realise that there may be evidence of malpractice. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the BDG. They may also fear harassment or victimisation.

In line with the BDG commitment to high standards of openness, integrity and accountability, BDG expects anyone who has a reasonable belief that malpractice is taking place within BDG to come forward and voice those concerns internally. This may be an awareness of suspected irregularity, wrongdoing or failure of standards. This code provides the means for staff, volunteers, service users to make such disclosures.

Often it may be easier for people to ignore the concern rather than report what may just be a suspicion of poor practice. BDG would urge anyone to come forward and voice those concerns.

This policy details how individuals can raise a matter of concern without fear of victimisation, subsequent discrimination or disadvantage. The policy is intended to encourage and enable individuals to raise serious concerns within the BDG rather than overlooking a problem or blowing the whistle outside.

It is in the interest of all concerned that disclosure of potential abuse or irregularities are dealt with properly, quickly and discreetly.

5.0 Safeguarding

Staff, volunteers, parents or other participants are often the first to realise that a child's safety and welfare are under threat. However, they may not express their concerns because they feel that speaking up would be too difficult to handle. It may also be that they fear harassment or victimisation. There may be similar concerns when it comes to threats to vulnerable adults.

BDG realises that raising a concern and reporting allegations are often difficult to make through fear of reprisals from those responsible for the alleged poor practice. If the individual believes what they say to be true and are not deemed to be malicious then BDG will fully support the whistleblower and will not tolerate any bullying, harassment or victimisation whatsoever. If this does occur, any perpetrators will be dealt with under the BDG disciplinary procedures.

While the policy speaks of line managers in terms of safeguarding consider that to mean the Designated Safeguarding Officer.

6.0 Equality, Inclusion and Anti-Discrimination

BDG is committed to the promotion of equality within BDG and affiliated organisations, through the way we manage BDG and provide services to service users, customers, partners and volunteers. In order to express this commitment, we develop, promote and maintain policies that will be conducive to the principles of fairness and equality.

7.0 Raising a Concern or Making an Allegation

This policy provides you with a procedure for making disclosures internally about suspected wrongdoing, irregularity or failure of standards within the BDG. Its aims are:

- a) To encourage you to feel confident in raising serious concerns and to question and act upon concerns about possible malpractice within the Trust.
- b) To provide a means for you to disclose those concerns and receive feedback on any action taken.
- c) To ensure that you receive a response to your concerns and that you are aware of how to pursue them further if you are not satisfied.
- d) To reassure you that you will be protected from possible reprisals or victimisation and from subsequent discrimination or disadvantage.

Any serious concerns that you have about an aspect of service provision or conduct of BDG employees, volunteers or directors or others acting on behalf of the BDG can be reported under this code. This may be about something that:

Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe the Club subscribes to.

- a) Is against BDG policies.
- b) Falls below established standards of practice.
- c) Amounts to improper conduct.

8.0 Confidentiality

All disclosures will be treated in confidence and wherever possible, every effort will be made not to reveal your identity. However, you may need to come forward as a witness and you will be given every support from management at that time.

9.0 Anonymous Disclosure

You should put your name to your disclosure whenever possible. Disclosures made anonymously will still be considered at the discretion of the BDG. However, it is helpful to have your name in case further information is required.

In exercising its discretion, BDG will consider:

- a) The seriousness of the issues raised.
- b) The credibility of the disclosure.
- c) The likelihood of confirming what is alleged from attributable sources.

10.0 Untrue Disclosures

If you make a disclosure in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, your allegation is frivolous, malicious or for personal gain, you may be subject to disciplinary action.

11.0 Employee Action

As a first step, you should normally raise your concerns with your line manager. If you believe your line manager is involved, you should approach a director. This depends however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If you believe that your line manager and a director or senior officer are involved, you should approach **Geoff Parsons – By Design Group Executive Chairman**.

You may raise your concern either verbally or in writing. The earlier you express the concern, the easier it is to act. You should provide:

- a) Details of your concerns, including the nature, dates and location of any relevant incidents.
- b) Reasons why you feel concerned about the situation.

Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite a representative to be present during any meetings or interviews in connection with the concerns you have raised.

The amount of contact between you and the person considering the issues will depend on the nature of the matter raised, the potential difficulties involved, and the clarity of the information provided. If necessary, the BDG will seek further information from you.

12.0 Action Taken by BDG

The BDG will respond to your disclosure. Where appropriate, the matters raised may be:

- a) investigated by management, by internal audit, or through the disciplinary process;
- b) referred to the police;
- c) referred to the external auditor;
- d) the subject of an independent inquiry.

In order to protect individuals and those accused of possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The over-riding principle BDG will have in mind is the public interest. The disclosures for which there are other specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any action investigation is conducted.

Within 10 working days of a concern being raised, you will receive a response:

- a) acknowledging that the concern has been received;
- b) telling you whether any initial enquiries have been made;
- c) indicating how the matter is going to be dealt with;
- d) giving an estimate of how long it will take to provide a final response;
- e) supplying you with information on staff support mechanisms;
- f) telling you why if there is to be no further investigation.

BDG will take steps to minimise any difficulties you may experience as a result of making a disclosure. For instance, if you are required to give evidence in criminal or disciplinary proceedings BDG will arrange for you to receive advice about the procedure.

You will need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, you will be informed of the outcomes of any investigation.

13.0 How the Matter Can Be Taken Further

This code is intended to provide you with a route within the BDG to make disclosures of malpractice. The BDG hopes you will be satisfied with any action taken. If you are not, and you believe the information you have disclosed is substantially true, possible contact points are:

- a) Public Concern at Work
- b) The external auditor
- c) Your trade union
- d) Your local Citizens Advice Bureau
- e) Relevant professional bodies or regulatory organisations
- f) A relevant voluntary organisation
- g) The Police

If you do take the matter outside the BDG, you should ensure that you do not disclose confidential information. Check with the person dealing with your disclosure within BDG before divulging any information.

All investigations concerning safeguarding will be undertaken by **Georgia Nash – Designated Safeguarding Officer** who may be supported by an appropriate member of the Management Team. However, should you feel that you have not received a satisfactory response to your concern you can approach the following people / organisations:

Stephen Frew - Governance and Compliance Manager and Deputy Designated Safeguarding Officer

Office: 01827 3337237
Mobile: 07814 384622
Email: stephenfrew@bydesign-group.co.uk

Robbie Ridler – Deputy Designated Safeguarding Officer

Office: 01827 3337237
Mobile: 07471 351668
Email: robbieridler@bydesign-group.co.uk

Geoff Parsons – By Design Group Executive Chairman

Office: 01827 316297
Mobile: 07770 452161
Email: geoffparsons@bydesign-group.co.uk

Staffordshire - Local Authority Designated Officer (LADO) for Safeguarding:

Telephone: 01785 278958 or 01785 278997

Staffordshire County Council's First Response Service:

Telephone: 0800 1313 126

Open: Monday - Thursday 8:30am - 5:00pm

Friday 8:30am - 4:30pm

E-mail: firstr@staffordshire.gov.uk

Emergency Duty Service:

(Out of Hours Service)

Telephone: 0345 6042886

Local Children's Social Care

Tamworth Area Office

Marmion House

Lichfield Street, Tamworth, B79 7BZ

Tel: 0300 111 8010

Fax: 01827 475515

Sensory Phone (Hearing Impairments): 07976 191448

Minicom: 01827 475510

E-mail: tamworth.socialservices@staffordshire.gov.uk

Opening Hours

Monday: 8.30am - 5.00pm

Tuesday: 8.30am - 5.00pm

Wednesday: 8.30am - 5.00pm

Thursday: 8.30am - 5.00pm

Friday: 8.30am - 4.30pm

Saturday: Closed

Sunday: Closed

Out of Hours contact: Emergency Duty Service: 07815 492613

Alternatively, in an emergency you can contact Staffordshire Police Central Referral Unit on 101 or dial 999

Please note that similar details and numbers are available for all areas of the country that we work in via the Internet. If in doubt, please contact your line manager or designated safeguarding officer.

For issues around Equality, **Stephen Frew – BDG Governance and Compliance Manager** will investigate any issues that are raised. Should you wish to raise an issue away from the BDG then the Equality Advisory & Support Service (EASS) offers a free National Helpline - Advice and Support for incidents of discrimination and human rights. 0808 800 0082

For wider issues with malpractice any investigation will be by **Geoff Parsons – By Design Group Executive Chairman**, again you can raise concerns externally through these organisations:

- a) The Citizens Advice Bureau- 01246 209164
- b) Staffordshire Police - 101