

## Whistleblowing Policy

16.08.23

### Policy

It is important that any fraud, misconduct or wrongdoing by anyone working on behalf of HemingfordHub is reported and properly dealt with. We therefore require all individuals to raise any concerns that they may have about the conduct of others in HemingfordHub or the way in which the organisation is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

### Background

A qualifying disclosure is one made by a volunteer who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- discrimination
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is the Trustees's responsibility to investigate.

### Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing. Anyone working on behalf of HemingfordHub should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- Anyone raising a matter under this procedure will be taken seriously and reports acted upon. However a maliciously made false allegation will be treated accordingly.
- If misconduct is discovered as a result of any investigation under this procedure our disciplinary procedure will be used, in addition to any appropriate external measures.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, you should not agree to remain silent. You should report the matter to the Trustees .

### Procedure

In the first instance, any concerns should be raised with the Trustees who will arrange an investigation of the matter. The investigation may involve you and other individuals giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained. Any necessary action will be taken, and you will be told the outcome.

If you are concerned that a member of the Trustees is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigations to the relevant person, you should escalate the matter with another member of the Trustees .

If you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. You can find the full list of these organisations in The Public Interest Disclosure (Prescribed Persons) Order 2014: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf)

## **Data protection**

When an individual makes a disclosure, we will process any personal data collected in accordance with the data protection policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to individuals only for the purposes of dealing with the disclosure.

The HemingfordHub Trustees will review this policy and related good practice annually.

Chairman's Signature: *Tish Peck*

Adopted by the HemingfordHub Trustees on: 16/08/2023

Latest Review Date: August 2024