The Gatehouse Whistleblowing Policy

Policy ID Number: P05

Policy Passed by Board of Trustees: 9th September 2026 **Valid until:** 1st December 2027

Introduction

Whistleblowing is when an individual knows, or suspects, that there is some wrongdoing occurring within an organisation and alerts the employer or the relevant authority accordingly.

The Gatehouse aims to conduct its business at all times with the highest standards of integrity and honesty. We expect all employees and workers to maintain the same standards in everything they do.

Everyone who works for us is encouraged to report any perceived wrongdoing by the organisation or its employees, workers, contractors or agents that falls short of these principles.

The Public Interest Disclosures Act 1998 protects employees and workers who report serious wrongdoings within the workplace. For a disclosure to be protected it must reasonably appear to the individual that it is in the "public interest". This policy should not be used to question financial or business decisions taken by the Charity nor as a means of reconsidering any matters that have already been addressed under our grievance, disciplinary or other procedures.

This policy is not contractual but sets out the way in which we plan to manage such issues. We reserve the right to vary, amend or withdraw it at any time.

Scope of this policy

This policy applies to all employees and officers of the organisation as well as casual and/or agency workers. It does not apply to self-employed contractors or volunteers, although we ask everyone who works with us to comply with the principles of this policy and to raise any concerns so that these can be appropriately investigated.

Aims of this policy

This policy aims to assist us in the early identification of any inappropriate behaviour or practices within the Charity and to provide a clear procedure for individuals to report to us any wrongdoing at work which they believe has occurred or is likely to occur.

This policy aims to ensure everyone feels confident and able to raise any reasonable concern in the knowledge that it will be taken seriously, through offering protection to those who make a protected disclosure either during their employment (or duration of the contract/agreement) and also after this has ended, and to enable them to take action in respect of any victimisation.

Responsibilities

- The overall responsibility for implementing and monitoring the effectiveness of this policy rests with the CEO.
- Managers have a crucial role to play in encouraging individuals under their supervision to report any concerns they may have.
- Any individual who has knowledge of, or reasonably suspects, any fraud, theft or other suspicious or unlawful act taking place within the Charity is required to report this using the procedure set out below.
- Everyone, irrespective of their job or seniority, is required not to subject any other employee or worker to any detrimental treatment, nor harass or bully such an individual on the basis that they have raised a concern under this policy. They are also required not to encourage others to do so nor to tolerate such behaviour. Disciplinary action, including dismissal, may be taken against any employee found guilty of such behaviour. In addition, any individual who has victimised a colleague may be personally liable for any such victimisation.

Reporting concerns

Individuals are encouraged to use the procedure set out below if they have a concern about any of the following:

- wrongdoing at work, including any criminal offence
- a failure to comply with legal obligations or breach of any statutory Code of Practice (however, note that any complaint relating to an alleged breach of an employee's individual contract should be raised under our Grievance Procedure)
- a miscarriage of justice
- a breach, or potential breach, of health and safety legislation
- damage to the environment, or
- deliberate concealment of any of these.

This list is not exhaustive but indicates the types of concerns that should be raised:

- misuse of assets (including stores, equipment, buildings, computer hardware and software)
- failure to comply with appropriate professional standards

- bribery, corruption or fraud including the receiving or giving of gifts or hospitality in breach of our procedures
- falsifying records
- failure to take reasonable steps to report and rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income to the organisation or would otherwise seriously prejudice the organisation
- abuse of authority
- using the power and authority of the Charity for any unauthorised or ulterior purpose
- causing damage to the environment.

The individual does not have to be able to prove the allegations but should have a reasonable and genuine belief that the information being disclosed is true: some allegations may prove to be unfounded, but we would prefer the issue or concern to be raised, rather than run the risk of not detecting a problem early on.

The individual should discuss the matter with their manager in the first instance. However, should they prefer (perhaps because the manager is unavailable, or indeed might be the cause of the concern), then any of the following, all of whom are designated to deal with such matters, may be approached: CEO or a Trustee of the Charity.

Where requested, we will respect (so far as we can legally) the confidentiality of any whistleblowing complaint received but cannot guarantee that the investigation process will not result in colleagues speculating on the identity of the whistleblower.

It must be appreciated that it will be easier to follow up and verify complaints if the individual is prepared to give their name; unsupported anonymous complaints and allegations are much less powerful and therefore will be treated with caution.

We recognise there may be matters that cannot be dealt with internally and external authorities (such as the Police, the Health and Safety Executive or external auditors) will need to become involved. Where this is necessary, we reserve the right to make such a referral without the individual's consent.

If the matter requires further investigation, this will be carried out and the individual raising the concern will be informed of the outcome of the investigation and what action, if any, has been taken. Where such investigation involves outside agencies (e.g. the Police) this may cause some delay in the investigation.

If the individual raising the concern remains dissatisfied at the speed or conduct of the Charity's internal investigation, or the way in which the matter has been resolved, they should refer the matter to a Trustee.

Individuals can also contact Protect for confidential and independent advice about whistleblowing. Their details are Tel: 020 3117 2520 Email: whistle@protect-advice.org.uk Website: https://protect-advice.org.uk/

Alerting outside bodies to a potential wrongdoing

The individual should always, in the first instance, raise a concern about a wrongdoing or potential wrongdoing by following the procedure outlined above. If the individual has exhausted the internal procedure however, and is still not satisfied with the response, they are entitled to contact a relevant external body to express their concerns. In doing this, the individual should:

- have a reasonable belief that the allegation is based on correct facts
- make the disclosure to a relevant body, and
- have a reasonable belief it is in the public interest to make the disclosure.

A "relevant body" is likely to be a regulatory body, e.g. the Health and Safety Executive, Financial Services Authority, etc. The media, including social media, is not a relevant external body, and individuals should not contact the media regarding concerns about the organisation.

If you are dissatisfied with the outcome of this internal procedure you have the right to express your concerns to the relevant Prescribed Person designated by the Public Interest Disclosure (Prescribed Persons) Order 2014, or any statute or statutory instrument which subsequently supersedes this legislation.

Protection against detriment

We aim to ensure that no-one who makes a bona fide report under this policy will be subjected to any detriment as a result. If any individual feels that they are being subjected to detrimental treatment, bullying or harassment by any person within the organisation (including their colleagues and co-workers) as a result of the decision to invoke this policy, they must inform the CEO immediately and appropriate action will be taken to protect them from any reprisals.

However, if it should become clear that the policy has been invoked for malicious reasons or to pursue a personal grudge, this will constitute misconduct and will be managed in accordance with our Disciplinary Procedure.

Furthermore, if the individual does not follow the procedure set out above, the protection against detriment will not apply. Disclosing information in an inappropriate way (e.g. by contacting the media) could result in disciplinary action being taken, which could include dismissal.

Ex-employees and former contractual workers

Any protected disclosures made by employees or contractual workers after the termination of their employment/contract will be dealt with under this policy. In such cases, the Charity would normally ask that the individual sets out the details of their concern in writing. The

Charity will then respond in writing, having undertaken such investigation as is deemed to be appropriate.

Data protection

When an individual makes a disclosure, the Charity will process any personal data collected in accordance with our 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.

Inappropriate access or disclosure of employee data constitutes a data breach and should be reported in accordance with our Data Protection Policy immediately. It may also constitute a disciplinary offence, which will be dealt with under our Disciplinary Procedure.

Implementation, monitoring and review of this policy

Any queries or comments about this policy and the procedure should be addressed to your line manager. If this is not appropriate, to a senior manager or trustee.