

# Whistleblowing/ Disclosure of Public Interest Policy and Procedure

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<b>Policy consultation with:</b>	Originally - Staff Engagement Forum, Care & Support Area managers, Supported Housing management, Executive team, HR team.		
<b>Legal Requirements:</b>	This policy aligns with relevant UK employment legislation, including the Employment Rights Act 2025.		
<b>CQC/ Other:</b>	KLOE-Safe Practice		
<b>Related Policies:</b>	Data Protection policy	Disciplinary policy	
	Code of Conduct	EDI strategy	
<b>Scope:</b> This Policy and the accompanying Procedure will be applied irrespective of; the race, gender, marital status, disability, sexuality, religious belief, age, pregnancy or maternity leave of the employee concerned. This policy applies to all employees and workers employed by us. Other individuals, including our contractors, subcontractors, suppliers and volunteers are also encouraged to follow the procedure set out in this policy.			
<b>Policy Equality Impact Assessed</b>			

Version number	Amendments	Reviewed by	Date
06	Updates related to the Employment Rights Act 2025	Elena Mouza	Apr 2026

This information can be made available in alternative formats, such as easy read or large print. Please contact 0208 980 7101 or email [info@outward.org.uk](mailto:info@outward.org.uk)

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## 1. Purpose, Scope and Principles

- 1.1. Whistleblowing is one of the most effective ways of preventing and eliminating wrongdoing at work. We recognise that raising a whistleblowing concern can be daunting. However, we encourage you to report concerns internally as soon as possible where you suspect wrongdoing. We are here to listen and will take all concerns that you raise seriously.
- 1.2. This policy sets out the procedure for raising a whistleblowing concern and the support and protection that is available to you when you do so.
- 1.3. Reporting a wrongdoing is also known as making a ‘*whistleblowing disclosure*’ or ‘*protected disclosure*’. The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.
- 1.4. If your concern relates to a *personal grievance* that is *not in the public interest*, you should raise it under our separate grievance procedure.
- 1.5. If you are unsure about whether your concerns are best dealt with under the whistleblowing policy or grievance procedure, please speak to the HR team for further advice.
- 1.6. This policy does not form part of your contract of employment, and we reserve the right to amend or withdraw it at any time.
- 1.7. We understand it can be difficult to raise concerns, especially if they're serious or involve colleagues. You might worry about speaking up or raising a false alarm. Our policy is here to assure you that you can safely raise issues, and we encourage you to do so early rather than wait
- 1.8. This policy reflects our commitment to promoting the best interests of the people we support.

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## 2. How to raise a concern (Procedure).

### Whistleblowing concerns to which this policy relates.

- 2.1. Whistleblowing is the act of reporting suspected wrongdoing or risk of wrongdoing relating to:
  - a criminal offence;
  - a failure to comply with a legal obligation;
  - a miscarriage of justice;
  - a risk to the health and safety of an individual;
  - sexual harassment;
  - damage to the environment; or
  - an attempt to cover up any of the above.

- 2.2. For the avoidance of doubt, concerns relating to sexual harassment fall within the scope of whistleblowing under this policy where the concern is raised on or after 6 April 2026, irrespective of when the alleged incident or incidents occurred.
- 2.3. It is not necessary for you to prove the wrongdoing. However, to be protected by whistleblowing laws against detrimental treatment or dismissal, you must reasonably believe that wrongdoing (related to one of the categories listed above) is being, has been, or is likely to be committed and that your disclosure is in the public interest.

### **Stage 1 - Raising a whistleblowing concern**

- 2.4. You can report things that are wrong, illegal, or if anyone at Outward is failing to uphold their responsibilities, including if they are
  - Putting someone's health and safety in danger
  - A whistleblowing disclosure about sexual harassment
  - Damaging the environment
  - Committing a criminal offence
  - Abusing a vulnerable person
  - Misuse funds
  - You can report things that are wrong, illegal, or if anyone at Outward is failing to uphold their responsibilities, including if:
    - The Organisation is not obeying the law (such as not having the right insurance)
    - Covering up wrongdoing
- 2.5. In such circumstances, you may need to disclose information outside of the internal complaints process, and you would do that through this policy and procedure.
- 2.6. If you have a genuine concern relating to any type of wrongdoing that is covered under this policy, you should raise it with your line manager. If your concern relates to your line manager, or for any reason you do not wish to approach your line manager, you should raise your concern with a more senior manager, a Director or the HR team.
- 2.7. You can raise your concern verbally, or in writing. We ask that you are prepared to give us as much information as possible so that we are able to conduct a thorough investigation of your concerns. Local managers should notify a Director before undertaking their own investigation. It is important that you set out clearly:
  - the details of the suspected wrongdoing;
  - the names of any individuals involved; and
  - what action (if any) you are seeking.
- 2.8. Where an investigation leads to a reasonable and genuine belief of poor conduct, action will be taken under Outward's Disciplinary Policy and Procedure.
- 2.9. In some cases, it may be necessary to ask you to attend a meeting to clarify the nature of your concern. This will be arranged as soon as possible. Where it is considered appropriate, a member of the HR department may also be present.

### **Stage 2 - Responding to your whistleblowing concern**

- 2.10. The HR team will determine if an investigation is required and, if it is, the most appropriate person to conduct it. We will write to you confirming that we are conducting an investigation.
- 2.11. The level of investigation and time this will take will vary depending on the nature of the suspected wrongdoing.
- 2.12. All concerns will be investigated carefully and thoroughly. When raising these concerns, you and anyone implicated by those concerns will be treated fairly and equitably. We may hold an informal review, an internal inquiry or a more formal review. We will tell you who will be handling the matter, how you can contact them and what further assistance we may need from

you in order to complete the investigation. Depending on the nature of the issue reported, it may be necessary to involve external agencies, for example, the police.

- 2.13. Whenever possible, we will try and provide you with feedback on the outcome of any investigation. Please note that in certain situations we may not be able to disclose the precise actions we take where this would infringe a duty of confidence we owe to another person.
- 2.14. We will inform you in writing, as quickly as possible after completion of the investigation, of the outcome and any next steps or action that will be taken. While we aim to provide you with comprehensive feedback, in some cases this may not be possible, for example where data protection rules apply or there are sensitive issues that need to remain confidential.
- 2.15. While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle all matters fairly and properly.

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### 3. Escalation and external reporting.

- 3.1. If it is not possible to raise a concern through the line management, Senior Management Team, Executive Directors Team structure, then:
  - If the problem involves very senior staff the Chief Executive or a Member of the Board should be contacted. (Details of current Board membership can be found on the Intranet under 'Our Board and Governance').
  - In the case of a serious criminal offence the police should be contacted.
  - In the case of the abuse of people at risk the local authority, CQC should be contacted.
  - In the case of public funds, or failure to comply with a regulatory requirement, Social Services, or the Benefits Agency (as appropriate) should be contacted.
- 3.2. If after raising your concern internally, or if you feel that you cannot do so because you believe that you may be subject to victimisation, or that evidence will be destroyed or concealed, then you can also make a protected Disclosure through Whistleblowing to:
  - A legal advisor
  - A prescribed body, such as the Data Protection Registrar, the Environment Agency, the Health and Safety executive or Public Concern at Work
  - An individual unconnected with the organisation
  - And/or the local Safeguarding Authority.
- 3.3. We encourage you to raise your whistleblowing concerns internally in the first instance. If you feel that appropriate action has not been taken, you can report the matter to the correct prescribed body or person (see [list on GOV.UK](#)).
- 3.4. You should seek advice if you are thinking of raising your concern with the media as you will not have protection under whistleblowing laws unless certain conditions are met.

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### 4. Protection and Safeguards

- 4.1. If you need further guidance or support, you can contact the whistleblowing charity [Protect](#) or [Citizens Advice](#) for free confidential advice.

#### Confidentiality and anonymous reporting.

- 4.2. We want you to feel comfortable about raising a whistleblowing concern openly and actively encourage you to do so.
- 4.3. Where you raise a whistleblowing concern openly, we will maintain your confidentiality as far as possible. If we need to identify your identity to anyone, we will notify you beforehand.
- 4.4. In the alternative, you may decide to raise a whistleblowing concern anonymously.

- 4.5. We encourage anonymous reporting over remaining silent. Although we will investigate any concern that is reported anonymously as best we can, an anonymous report is likely to be more difficult for us to investigate, and we will not be in a position to provide you with any feedback.

### **Your protection and our commitments**

- 4.6. You have the right not to be subjected to any detrimental treatment (including being unfairly penalised, disciplined or dismissed) because you have raised a whistleblowing concern.
- 4.7. If you raise a whistleblowing concern in accordance with this policy, we will ensure that you are treated with respect and provided with adequate support and protection.
- 4.8. Your career will not be harmed in any way as a result of having made a protected disclosure through whistleblowing (whether the item reported proves to be true or not, provided that the reporting was carried in reasonable belief).
- 4.9. If you are told not to raise or pursue a whistleblowing concern, or you believe that you have been subjected to detrimental treatment because you have raised a whistleblowing concern, you should report the matter to the HR team via HRAdmin@outward.org.uk. In the alternative, you can raise it under our Grievance procedure if it applies to you.
- 4.10. Any such behaviour will not be tolerated and will be treated as a disciplinary offence. If we find that an individual has knowingly raised false allegations, this will also be treated as a disciplinary offence.
- 4.11. Outward subscribes to an employee assistance help line run by Health Assured. Should you have personal issues relating to wellbeing, illness, managing money then Health Assured can offer expert advice, invaluable information specialist counselling and support. You can confidentially contact Health Assured 24 hours a day, 7 days a week, 365 days a year on 0800 030 5182 or via their website at [www.healthassuredap.co.uk](http://www.healthassuredap.co.uk)

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Outward is committed to compliance with the General Data Protection Regulations and the Data Protection Act 2018. It requires all staff and partners to respect confidentiality and data subjects' rights in line with its policies and procedures. To ensure compliance with the Regulations staff must ensure that any personal information produced or processed as part of these procedures is appropriately filed on SharePoint, Sona, Nourish, iTrent, lplanit, the Outward server or other agreed Password-controlled filing system(s) with role-based access control.

Whilst processing paper documents, including those from third parties, these documents must be stored in secure lockable cabinets. Records will be kept for as long as they are needed to meet the operational needs of Outward, together with legal and regulatory requirements. Where there is a deviation from this principle, the reasons for this must be recorded. A detailed breakdown of retention and deletion of records can be found in Outward's Record Management and Retention Policy.

When disposing of documents containing personal data this should be done via confidential waste. Please refer to Outward's Data Protection Policy and Procedure for more information.

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