



# The Real Junk Food Project Central

## *Official Governance*

**RCG0010**

Whistleblowing Policy V4

*Ratified on Wednesday 21<sup>st</sup> of November 2018*

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*The document and its contents are subject to revision, replacement and abolition, upon the unanimous decision of the Board of Directors*

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## **The Real Junk Food Project Central CIC**

### **Whistleblowing Policy**

#### **1. Policy statement**

- A) The Real Junk Food Project Central CIC (hereby referred to as “the Company”) is committed to the highest possible standards of openness and accountability. In line with that commitment we encourage volunteers and employees with serious concerns about any aspect of the operations of the Company, to come forward and voice those concerns.

#### **2. Aims and objectives**

- A) The objectives of this procedure are to:
- Provide avenues to raise concerns and receive feedback on any action taken.
  - Allow volunteers and employees to take the matter further if they are dissatisfied with the response they receive.
  - Provide reassurance that there will be protection from reprisals or victimisation for whistleblowing in good faith.
- B) There are existing procedures in place to enable volunteers and employees to raise a grievance relating to their own employment or relationship with the Company. This procedure is intended to cover concerns that fall outside of the scope of the Volunteer and Employee Grievance Procedure. The concern may be about something which:
- Is unlawful.
  - Is contrary to the Company’s policies and procedures.
  - Falls below established standard or practices.
  - Amounts to improper conduct.
- C) Whilst not an exhaustive list, the following are examples of incidents for which the Whistleblowing Policy is intended to cover:
- Misconduct or ill treatment of an individual.
  - A criminal offence that has been, is being, or is likely to be committed.
  - Suspected fraud.
  - Disregard for legislation, particularly that concerning health and safety.
  - Breach of financial regulations.



### **3. Harassment and victimisation**

- A) It is recognised that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for the misconduct. Harassment and victimisation will not be tolerated and action will be taken to protect an individual when they raise a concern in good faith.
- B) The Company will do its best to protect the identity or name of the individual when a concern is raised. However, the investigation process may reveal the source of the information and a statement from the individual may be required as part of the evidence.

### **4. Anonymous allegations**

- A) This procedure encourages the individual to put their name to the allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the Board of Directors.
- B) In exercising discretion, the factors to be taken into account would include the:
- Seriousness of the issues raised.
  - Credibility of the concern.
  - Likelihood of confirming the allegation from an attributable source.

### **5. Untrue allegations**

- A) If an allegation is made in good faith, but it is not confirmed by the investigation, no action will be taken against the individual. If, however, unfounded allegations are made knowingly and with malice, the involvement or employment of the volunteer or employee will be reconsidered. Such actions will be considered gross misconduct and will be subject to the Volunteer and Employee Disciplinary Procedure.

### **6. Whistleblowing procedure**

- A) This policy applies where there are no other policies available for raising concerns.
- B) As a first step, concerns should be raised with a Co-director. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the misconduct. If in doubt, contact the Board of Directors.
- C) Concerns are better raised in writing. This should include the background and history of the concern, giving names, dates and places where possible, and the reason why the situation is of particular concern. If it is not possible to put the concern in writing, a telephone conversation or meeting with a Co-director can be arranged. It is important to express the concern at the earliest opportunity.



- D) It is important to show that there are sufficient grounds for the concern.
- E) The response from the Board of Directors and subsequent action will depend on the nature of the concern. Potential actions include:
- An informal resolution by agreed action, without the need for investigation.
  - An internal investigation conducted by at least one Co-director.
  - A referral to the Police or other relevant authorities.
- F) In order to protect all parties involved, initial enquiries will be forwarded to the Board of Directors, who will decide whether an investigation is appropriate and, if so, what form it should take. The Board of Directors may decide to take no further action if a complaint appears to be trivial or without reasonable grounds. Some concerns may be resolved by agreed action without the need for investigation and parties will be involved in those discussions.
- G) If an investigation is required, the Board of Directors will designate a named Co-director to investigate the concerns (hereby referred to as “the investigator”). Following this, the investigator will, within ten working days, write to the person who raised the concern, outlining the following details:
- An acknowledgement that an investigation will be carried out.
  - An indication of how the investigation will be carried out.
  - An estimated timescale for the investigation and how long it will take to provide a final response.
  - An indication of whether any initial enquiries have been made.
  - An indication of whether further investigation will take place, and if not, why not.
  - A confirmation that the investigation will be carried out in the strictest confidence.
- H) When any meeting is arranged, all parties have the right if they so wish, to be accompanied by an appropriate colleague who is not involved in the area of work to which the concern relates.
- I) The investigator will report on the outcome of the investigation to the Board of Directors, who will approve and monitor the implementation of the recommendations of the investigator.

## **7. Escalating concerns**

- A) This procedure is intended to provide an avenue to raise concerns within the Company. If a satisfactory conclusion is not reached and further investigation is required, the following are possible contact points:



- The Board of Directors, or any individual Co-director.
- Relevant professional bodies or regulatory organisations.
- The Police.

## 8. Monitoring and review

- A) This policy will be issued to all employees and volunteers. Any monitoring information collected will be used to monitor the effectiveness of the Whistleblowing Policy. Information will be processed in accordance with the General Data Protection Regulations, as outlined in the Company's Privacy Statement.
- B) The Whistleblowing Policy will be reviewed six months from the date of approval. The next review of this policy shall be conducted and approved no later than **Wednesday 29<sup>th</sup> of May 2019.**

## 9. Approval

Version 4 of the Whistleblowing Policy was reviewed and approved by the Board of Directors on **Wednesday 21<sup>st</sup> of November 2018.**