

Progressio Whistle-Blowing Policy

Progressio is committed to promoting an open and transparent environment where effective and honest communications are essential to maintain our values. An important aspect of accountability and transparency is a mechanism to enable employees and other members of the organisation to report serious malpractice or wrongdoing in a responsible and effective manner without fear of reprisal.

Purpose

This policy is designed to enable everyone, including, but not exclusively, full- or part-time employees, UK or Overseas based, volunteers, Development Workers, Partners or Members, to raise concerns and to disclose information which they believe, shows malpractice or impropriety has occurred or may occur within Progressio, such as:

- a criminal offence, financial malpractice or fraud
- a miscarriage of justice
- damage to the environment
- failure to comply with a legal obligation
- a danger to the health or safety of any individual
- the deliberate covering-up of information tending to show any of these matters

This policy is not designed to question financial or business decisions taken by Progressio, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. It is separate from the grievance procedure as described in the Employee Handbook.

Procedures for Making a Disclosure

In the first instance the matter should be raised with your line manager, or your senior manager. Where this is inappropriate you should contact one of the Directors or the Chair of the Board of Trustees (contact details are available from the Head Office).

On receipt of a disclosure of malpractice, the individual who receives the disclosure must pass this information as soon as is reasonably possible, to the appropriate person as follows:

- The Executive Director who will nominate an investigating team
- Disclosures against the Executive Director should be referred to the Chair of Trustees who will nominate an appropriate investigating team.
- You have the right to bypass the line management structure and take your disclosure direct to the Chair of Trustees. The Chair may refer the disclosure

back to management if he feels that the management, without any conflict of interest, can more appropriately investigate the disclosure.

If there is evidence of criminal activity then the matter will be referred to the police. Progressio will ensure that any internal investigation does not hinder a formal police investigation.

Protection

This policy is designed to offer protection to those individuals who make a disclosure provided the disclosure is made:

- in good faith
- the individual reasonably believes the information and any allegation it contains are substantially true and is not acting out of personal gain
- the individual reasonably believe he/she is making the disclosure to the relevant person or body, ie someone prescribed to receive disclosures about the matters concerned

Safeguards

All disclosures will be treated in a confidential and sensitive manner. However where an investigation is necessary we will do everything possible, but cannot guarantee, to protect the identity of the individual.

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual, however in making a disclosure you should exercise due care to ensure the accuracy of the information.

Timescales

The investigating team will endeavour to respond to you in writing within 10 working days, setting out what further investigation, if any, is planned. Once the investigation is complete you will be advised of the results of the investigation as well as any corrective actions which are being taken.

Investigating Procedure

The investigating team should follow these steps:

- Full details and clarifications of the disclosure should be obtained.
- The investigating team should inform the individual against whom the disclosure is made as soon as is practically possible. The individual will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating team may consider the involvement of the appointed Auditors and the Police at this stage
- The allegations should be fully investigated by the investigating team with the assistance where appropriate, of other individuals / bodies.

- A judgement concerning the disclosure and its validity will be made by the investigating team. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Executive Director or Chair of Trustees as appropriate.
- The Executive Director or Chair of Trustees will decide what action to take. If the disclosure is shown to be justified, it will invoke disciplinary or other appropriate procedures.
- The individual who made the disclosure should be kept informed of the progress of the investigations and the final outcome.
- If appropriate, a copy of the outcomes will be passed to the appointed Auditors to enable a review of the procedures.

If the individual who made the disclosure is not satisfied that their concern is being properly dealt with by the investigating team, they have the right to raise it in confidence with the Executive Director or Chair of Trustees.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the individual is not satisfied with the outcome of the investigation, Progressio recognises the lawful rights of individual to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission or the Charity Commission).