

Whistleblowing Policy and Procedures

1. Policy Statement

Caxton Youth Organisation is committed to the highest standards of openness, honesty, and accountability. We encourage a culture where all staff, volunteers, and trustees feel empowered to raise concerns about any wrongdoing or malpractice. This Whistleblowing Policy is designed to provide guidance on how to report concerns and ensure they are addressed appropriately.

We strongly encourage anyone who becomes aware of potential wrongdoing to report it to us. We are committed to protecting whistleblowers from any form of detriment or retaliation.

2. Legal Context and Purpose of This Policy

This policy is compliant with the **Public Interest Disclosure Act 1998 (PIDA)**, which protects workers from detrimental treatment or dismissal for raising concerns about wrongdoing in the workplace. These concerns must be in the public interest and relate to one or more of the following:

- A criminal offence
- Breach of a legal obligation
- Miscarriage of justice
- Danger to health and safety
- Damage to the environment
- Deliberate concealment of any of the above

3. What is Whistleblowing?

Whistleblowing is when a worker reports suspected wrongdoing or dangers in relation to activities taking place within the charity. It must be a concern in the **public interest**, not solely a personal matter.

Examples may include:

- Financial malpractice or fraud
- Risks to the health and safety of service users, staff, or the public
- Breaches of legal obligations
- Safeguarding concerns
- Deliberate cover-up of wrongdoing

4. How Whistleblowing Differs from a Grievance

A **grievance** is a personal complaint about employment conditions, workload, pay, or relationships with colleagues. Grievances should be raised through the Charity's separate **Grievance Policy**.

Whistleblowing, in contrast, relates to concerns affecting others—such as the public, other staff, or the charity as a whole.

5. Who Can Raise a Concern?

This policy applies to:

- Employees (full-time or part-time)
- Volunteers
- Trustees
- Contractors and freelance workers
- Temporary agency staff

6. Point of Contact for Whistleblowing

The designated Whistleblowing Officer is:

Name: Esther Norman (until 16.6.25) Rose Swainston (from 17.6.25)

Position: CEO

Email: esther@caxtonyouth.org / rose@caxtonyouth.org

Phone: 07873723041

If the concern relates to the designated officer, it should be raised with an alternate the Chair of Trustees.

Name: Kate Boddington

Position: Chair of Caxton Youth Organisation Trustees

Email: cboddington@alixpartners.com

7. How to Raise a Whistleblowing Disclosure

Disclosures can be made:

- Verbally (preferably followed up in writing)
- In writing (email or letter)
- Anonymously, although this may limit the charity's ability to investigate

Include:

- Your name and contact details (unless anonymous)
- Background and nature of the concern
- Names and dates, where possible
- Any supporting evidence

Disclosures should be made to the Whistleblowing Officer. If there is a conflict of interest, you may report to the Chair of Trustees or an external prescribed body (e.g. the Charity Commission or Care Quality Commission if applicable).

8. Our Commitment to You

- We will treat your concern seriously and sensitively
- We will not tolerate any harassment or victimisation of a whistleblower
- You will not suffer detriment for making a disclosure in good faith, even if it turns out to be mistaken
- Any retaliation against a whistleblower may result in disciplinary action

9. How We Will Handle Disclosures

Stage 1

1. **Acknowledgement:** We will acknowledge receipt of the concern within 5 working days.
2. **Initial Assessment:** We will conduct a preliminary review to decide whether a full investigation is necessary.
3. **Investigation:** If warranted, an impartial investigator will be appointed. You may be asked to provide further information.
4. **Outcome:** The whistleblower will be informed of the outcome, where possible and appropriate.
5. **Reporting:** A summary report (anonymised where needed) may be shared with the Board of Trustees.

We aim to complete investigations within 28 days, though some cases may require longer.

Stage 2

Once the investigation is concluded, if you are concerned that the investigation was not conducted properly or the outcome of the investigations has not informed the appropriate people, you should contact the Chair of Trustees.

The Chair will arrange for a review of the investigation to be carried out, to make any necessary enquiries and make their own report to the board.

Stage 3

If on conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. This might include

- **Charity Commission** – concerns about misuse of charity assets
- **HMRC** – tax fraud
- **Health and Safety Executive (HSE)** – workplace safety
- **Police** – criminal behaviour

You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014 [The Public Interest Disclosure \(Prescribed Persons\) Order 2014](#)

10. 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.

11. Support for Whistleblowers

We understand that whistleblowing can be difficult. Support available includes:

- Confidential discussions with the Whistleblowing Officer
- Access to an external counselling service through our EAP
- Signposting to organisations such as:
 - **Protect (formerly Public Concern at Work)** – www.protect-advice.org.uk
 - **Charity Commission** – www.gov.uk/whistleblowing

11. Training and Awareness

We are committed to building a culture that supports whistleblowing. We will:

- Train all staff and volunteers on recognising and reporting concerns
- Ensure managers understand their responsibilities in handling disclosures
- Include this policy in new starter inductions
- Periodically review this policy to reflect best practice and legal updates

12. Review of Policy

This policy will be reviewed annually or sooner if there are changes to relevant legislation or good practice guidelines.

Date of review: 29th April 2025

Signed on behalf of the trustees:

A handwritten signature in black ink, appearing to be 'EN', with a long horizontal flourish extending to the right.

Esther Norman, Interim CEO

Next date of review: 29th April 2026