



ENABLE

The Voluntary and Community Sector
Learning and Skills Consortium

Whistle Blowing Policy

POL-008
Change History

First Published:	08/02/2012	Originally Created by:	SMT	
Person Responsible for Policy:	Enable CEO			
Date of Review	Reviewed by	Policy changes	Approved by	Date of next review
16 Feb 2018	Standards Officer	Small changes to wording and referencing	Operations Manager	23 July 2018
23 July 2019	SMT	No Changes	CEO / Trustees	20 July 2020
23/03/2020	BDM	Covid-19	SMT	21/04/2021
21/04/2020	SMT	No Changes	CEO	21/04/2021

Strategic Commitment

Enable is committed to the highest possible standards of openness, integrity and accountability. In line with this, we want anyone working for Enable, working with Enable or using our services that has a serious concern about any aspect of Enable's work to come forward and voice those concerns.

This policy applies to all employees, temporary or free-lance workers, volunteers, people undertaking work experience, contractors, members/providers and anyone using an Enable service.

Purpose

- To enable people to raise concerns in confidence.
- To ensure people receive a response to concerns raised and are aware of how to further pursue them if not satisfied.
- To ensure people are protected from possible reprisals or victimisation if they have a reasonable belief that they have made a disclosure in good faith.

Policy

Enable has a grievance policy and complaints policy. The whistle-blowing policy is intended to cover major concerns that fall outside the scope of other policies. These include:

- conduct which is an offence or a breach of law
- disclosures related to miscarriages of justice
- serious health and safety risks, including risks to the public as well as other employees
- damage to the environment
- the unauthorised use of public funds
- possible fraud and corruption
- sexual or physical abuse
- other unethical conduct

Harassment or Victimisation

Enable recognises that the decision to report a concern can be a difficult one to make and that those doing so should have nothing to fear because they will be doing their duty.

Enable will not tolerate any harassment or victimisation (including informal pressures) of people raising a concern and will take appropriate action to protect you when you raise a concern in good faith.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal the identity of anyone raising a concern if required. At the appropriate time, however, the person concerned may need to come forward as a witness.

Our policy is however to encourage people to put their name to any allegation whenever possible. This is because concerns expressed anonymously are much less powerful.

Original Date: 8/2/12

Review Date: 20 July 2020

Untrue allegations

Where an allegation is made in good faith but it is not confirmed by the investigation, no action will be taken against the person raising the concern. If, however, an allegation is made frivolously, maliciously or for personal gain, disciplinary action may be taken against the person raising the concern.

Raising a concern

Clear and simple procedures for raising a concern will be published and made accessible to everyone working for Enable, working with Enable or using our services.

People raising a concern will not be expected to prove beyond doubt the truth of an allegation but will need to demonstrate to the person contacted that there are reasonable grounds for the concern.

How Enable will respond

Enable will always respond to a concern raised.

Within 10 days of receiving the concern, every person raising a concern will be written to acknowledging that the concern has been received, indicating how it is proposed to deal with the matter and an estimate of how long it will take to provide a final response.

Where appropriate any particular concern raised may be referred to Enable's CEO/Board, be investigated through our disciplinary process, be referred to the police or be the subject of an independent inquiry.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.

Subject to legal constraints, everyone raising a concern will be informed of the outcome of any investigation.

Where someone raising a concern is unhappy with the outcome they will be provided with information about how they can take the matter further.

COVID-19

Enable's whistleblowing policies and processes now includes changes necessitated by COVID-19 – for example, in light of any corporate restructures and associated redundancies, bandwidth challenges of staff involved in the programme, or operational constraints faced by third party service providers. Investigation protocols may also need to be updated to address remote working arrangements and provide appropriate support to whistle-blowers, witnesses, and respondents.

Enable will keep lines of communication open with staff working remotely, now more than ever. Enable do not want employees to feel disconnected or isolated and Enable want them to know that they can raise any concerns identified or suspected issues internally. This may include reminding staff of the avenues available to them to raise concerns and encouraging managers or supervisors to check in regularly with their teams about any issues they are encountering.

Enable will adapt confidentiality measures with remote working arrangements, and actively encourage electronic data storage and communication, security protocols should incorporate the use of appropriate information barriers in relation to document storage, and limit access to communications that may contain confidential whistleblowing information.

Enable will ensure they keep abreast of whistleblowing laws, regulations, and guidance.

We will review all COVID policy statements as Government guidance changes.

Implementation

The Chief Executive has overall responsibility for the maintenance and operation of this policy. The Chief Executive will maintain a record of concerns raised and the outcome, ensuring this does not endanger confidentiality and will report as necessary to Enable's Board.

Signed: _____

Position: _____

Date: _____