

Whistleblowing Policy



1. Introduction

- 1.1. The Eldonian Community Trust ("the Charity") is committed to maintaining a culture of openness, integrity, and accountability. This policy sets out how individuals can raise concerns about serious wrongdoing or malpractice without fear of retaliation.
- 1.2. The Charity recognises its responsibility to ensure that trustees, volunteers, staff, and others who act in the Charity's name can speak up when they believe something is wrong, unlawful, or unethical.

2. Scope

- 2.1. This policy applies to all trustees, volunteers, employees (if any), contractors, and partners working with or on behalf of the Charity.
- 2.2. It covers concerns relating to:
 - 2.2.1. Criminal offences (e.g. fraud, bribery, theft)
 - 2.2.2. Misuse or mismanagement of charitable funds or assets
 - 2.2.3. Safeguarding failures
 - 2.2.4. Breach of legal or regulatory obligations
 - 2.2.5. Serious breaches of internal policies
 - 2.2.6. Dangerous practices or health and safety risks
 - 2.2.7. Covering up wrongdoing
- 2.3. This policy is not intended to replace the Charity's Complaints Policy (for general concerns) or Grievance Procedures (for personal employment matters).

3. Principles

- 3.1. All whistleblowing concerns will be taken seriously, investigated promptly, and handled with confidentiality.
- 3.2. No one who raises a concern in good faith will suffer any form of detriment, victimisation, or retaliation. The Charity will take appropriate action against any individual who retaliates against a whistleblower.
- 3.3. Concerns should be based on reasonable belief—even if the allegation proves to be unfounded.

4. Raising a Concern

- 4.1. Concerns may be raised verbally or in writing with:
 - 4.1.1. The Chair of Trustees
 - 4.1.2. The Secretary to the Board
- 4.2. Another senior trustee if more appropriate
- 4.3. Reports should include:
 - 4.3.1. The background and nature of the concern
 - 4.3.2. Names, dates, places, and other relevant information

4.3.3. Any supporting evidence, if available

4.4. Whistleblowers are encouraged to give their name, but anonymous concerns will still be considered where sufficient information is provided.

5. Investigation Process

5.1. The Chair or designated person will:

5.1.1. Acknowledge receipt of the concern

5.1.2. Conduct a preliminary review to determine appropriate action

5.1.3. Appoint an independent investigator if necessary

5.1.4. Keep the whistleblower informed (if contact is possible)

5.2. Outcomes may include:

5.2.1. No further action if the concern is unfounded

5.2.2. Disciplinary action if wrongdoing is confirmed

5.2.3. Reporting to the Charity Commission or other authorities if required

6. Confidentiality and Record-Keeping

6.1. All whistleblowing concerns and investigations will be handled in strict confidence.

6.2. Records will be kept securely and separately from other Charity records, accessible only to those with a legitimate need to know.

7. External Disclosures

7.1. If an individual is not satisfied with the Charity's response, or where internal reporting is not appropriate, they may raise concerns with:

7.1.1. The Charity Commission (for issues involving charity governance)

7.1.2. The police or safeguarding authorities (for criminal or safeguarding concerns)

7.1.3. A legal advisor or other prescribed regulatory body under the Public Interest Disclosure Act 1998

8. Policy Review

8.1. This policy was approved by the Board of Trustees on Friday 9th May 2025 and will be reviewed every two years or as required.