



Whistleblowing Policy

Introduction

Forbesy Camps is committed to maintaining a culture of openness, accountability and integrity. We seek to ensure that staff at Forbesy camp feel secure in raising concerns about any activity which may harm individuals or undermine Forbesy Camp. Forbesy Camp has adopted this Whistle Blowing policy to provide clear guidance to those who may need to raise concerns. This policy and procedure has been prepared in accordance with the Public Interest Disclosure Act 1998, The Advisory, Conciliation and Arbitration Services (ACAS) and the DfE guidance for safeguarding for after school and holiday clubs.

Purpose

Forbesy Camps expects its employees, and others involved in the work of Forbesy Camp, who have serious concerns about any aspect of Forbesy Camp's work to come forward and raise those concerns.

An employee may be the first person to realise that there could be something seriously wrong within Forbesy Camps. However, they may feel that speaking up would be disloyal to colleagues or to Forbesy Camps. They may also fear harassment or victimisation.

This policy aims to:

- encourage you to feel confident in raising serious concerns and to question and act upon concerns;
- provide avenues for you to raise those concerns and receive feedback on any action taken;
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied;
- reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have raised any concern in good faith.

Application of policy

All employees and contractors at Forbesy Camps have a responsibility for whistleblowing. The purpose of this policy and procedure is to make it clear that employees can raise concerns in confidence without fear of victimisation, subsequent discrimination or disadvantage. Employees are encouraged to raise serious concerns in the first instance within Forbesy camps, rather than overlooking a problem or 'blowing the whistle' outside and it is preferred that the matter is raised when it is just a concern rather than waiting for proof.



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This policy and procedure applies to all employees of Forbesy Camp. It also covers those providing services under a contract within Forbesy Camps and organisations working in partnership with Forbesy Camps.

Forbesy Camps recognises that employees may wish to seek advice and be supported by representative when raising a concern and acknowledges and endorses this option.

Scope

This policy and procedure is intended to cover concerns that fall outside the scope of other procedures, including Forbesy Camps Complaints Policy and Behaviour and Home Camp Agreement Policy.

This policy should be used for concerns about:-

- any unlawful act, whether criminal or a breach of civil law;
- maladministration, as defined by the Local Government Ombudsman
- breach of any statutory code of practice
- breach of, or failure to implement or comply with, Financial Regulations or Standing Orders
- any failure to comply with appropriate professional standards
- fraud, corruption or dishonesty
- actions which are likely to cause physical/mental/psychological danger to any person, or to give rise to a risk of significant damage to property
- loss of income to Forbesy Camps
- abuse of power, or the use of Forbesy Camps powers and authority for any unauthorised or ulterior purpose
- any other matter that staff consider they cannot raise by any other procedure.

It should be emphasised that this policy and procedure is intended to assist employees or contractors who have discovered malpractice or serious wrongdoing, provided they make the disclosure in accordance with the policy. It is not designed to question financial or business decisions taken by Forbesy Camps nor may it be used to reconsider any matters that have already been addressed under the Complaint or Behaviour and Home Camp Agreement Policy. Individuals who make disclosures outside the arrangements set out here will not be protected under this policy and may not be protected under the Act.

Protection

It can be difficult for an employee or contractor to make the decision to report a concern. If a concern is raised in good faith and based on reasonable belief, there should be nothing to fear.



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Forbesy Camps will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect an individual when they raise a concern, even if they are genuinely mistaken in their concerns. Any harassment or victimisation of a whistleblower would result in disciplinary action against the person responsible.

Under The Public Interest Disclosure Act 1998, employees are protected from dismissal or other detriment, as long as they follow their employers whistle blowing procedure.

Any investigations arising from whistleblowing will not influence or be influenced by any other procedures to which an employee may be subject.

If an employee's concern is not confirmed by the investigation, no action will be taken against them. If, however it is determined through an investigation that an employee made an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against them.

Personal grievance such as bullying, harassment and discrimination are not covered by UK whistleblowing law.

How to raise a concern

It is hoped that in most cases an employee/contractor will feel able to raise any concerns internally with the Scott and/or Kellie Forbes, speaking to them in person or putting the matter in writing if they prefer. They may be able to agree a way of resolving a concern quickly and effectively.

Where the concern relates to either Scott or Kellie Forbes, the employee/contractor should raise the concern with either the Welfare Manager or the Coordinator.

Scott and/or Kellie Forbes will meet with the employee/contractor as soon as practicable to discuss their concern. Recording sufficient details to enable the matter to be thoroughly investigated. As a minimum, they will record the name of the employee/contractor, but also indicate whether the individual wishes his or her identity to remain confidential and the nature of the concern.

It may not always be possible to maintain confidentiality and Scott and/or Kellie Forbes should explain this to the employee/contractor. In such instances, the employee/contractor will have the choice of either withdrawing or agreeing to his/her identity becoming known to enable the concern to be effectively dealt with.

The employee may bring a colleague or representative to any meetings under this policy. The confidentiality of the disclosure and any subsequent investigation must be respected.



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Scott and/or Kellie Forbes will take notes and produce a written summary of the concern raised and provide the employee/contractor with a copy as soon as practicable after the

meeting, along with an indication of how they propose to deal with the matter, where possible.

Investigating a disclosure

Once an employee/contractor has raised a concern, Scott and/or Kellie Forbes will carry out, within 10 working days, an initial assessment to determine the scope of any investigation. The employee/contractor will be informed of the outcome of this assessment. The employee/contractor raising the concern may be required to attend additional meetings in order to provide further information.

Scott and/or Kellie Forbes may consider it appropriate to refer the concern to an external agency for consideration in advance of any internal investigation. This may be appropriate where concerns about child safeguarding, potential criminal activity or unsafe working practices are raised. Where this is deemed appropriate, no further internal investigation should be undertaken until clearance is given.

Where necessary, Forbesy Camps may appoint an investigator or team of investigators, including those with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable Forbesy Camps to minimise the risk of future wrongdoing.

Scott and/or Kellie Forbes will aim to keep the employee/contractor informed of the progress of the investigation and likely timescale. Sometimes the need for confidentiality may mean that the employee/contractor cannot be given specific details of the investigation or any disciplinary action taken as a result. The employee/contractor is required to treat any information about the investigation as strictly confidential.

If it is concluded that an employee/contractor has made false allegations maliciously, in bad faith or with a view to personal gain, they will be subject to disciplinary action.

Whilst it cannot always be guaranteed that the outcome will be in line with the employee's/contractor's expectation, concerns will be dealt with fairly and in an appropriate way.

There is no right of appeal against any decisions taken under this policy and procedure.

External disclosure



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Employees or contractors who believe that the matter has not been taken seriously or is being covered up, may choose to report the concern externally to an appropriate body details of which are shown below:

- the Local Authority
- a Prescribed Person or Body (e.g. Ofsted, Children Commissioner or NSPCC - <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>)

Confidentiality

Forbesy Camps views confidentiality as a two-way process and will endeavour to maintain this approach, though they recognise this cannot always be guaranteed. In return we would expect concerns the employee/contractor has raised through this policy will remain equally confidential until there has been an opportunity for their assessment.

All concerns will be treated in confidence and every effort will be made not to reveal the identity of the employee/contractor raising the concern, if that is their wish. If Forbesy Camps are not able to resolve the employee's/contractor's concern without revealing their identity, it will be discussed with them beforehand.

Forbesy Camps also wishes to state that although a concern may also be raised anonymously, it may impede the designated managers ability to undertake a thorough assessment if the employee/contractor chooses to do so. Forbesy Camps would hope that the protection provided by this policy would refute the need for such actions. Concerns expressed anonymously are much less powerful but may be considered by Forbesy Camps, taking into account:

- the seriousness of the issues raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Forbesy Camps will decide in each case whether a complaint made anonymously should be investigated

Support and Advice

If the employee/contractor is unsure and wishes to seek support, they may wish to access advice or speak to the Public Concern at Work charity via e-mail whistle@pcaw.org.uk or telephone (020 7404 6609).

Employees/contractors may also seek advice from organisations such as Citizens Advice and/or The Advisory, Conciliation and Arbitration Services (ACAS) before taking action.



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Employees/contractors should contact the NSPCC's whistleblowing helpline if they have concerns about how child protection issues are being handled in an organization.