

Whistleblowing Policy

This Policy was last reviewed and approved in April 2024. HRAS International is committed to reviewing this policy annually.

Version	Date	Change	Author
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Who this policy applies to

This policy applies to everyone who works for HRAS International in some way, whether paid or unpaid, including employees, contractors, secondees, volunteers, and young people whilst employed on HRAS International programmes. Corporate partners and young people who are not currently employed by HRAS International (including, but not exclusive to, young people alumni and advisory board members) should refer to the separate HRAS International Complaints Policy.

Aims and Purpose of this policy

The aim of this policy is to provide a clear and transparent way for anyone who works for HRAS International in some capacity to raise genuine concerns about acts of wrongdoing or malpractice in the workplace. It also aims to ensure that any concerns are dealt with effectively and in a timely fashion.

HRAS International has a professional duty to have appropriate procedures for investigating whistleblowing reports. All those who work for HRAS International should be aware of their right to voice a concern in complete confidentiality and without fear of retaliation.

During the course of business you may become aware of conduct by HRAS International persons or HRAS International suppliers (or other associated external parties, including but not exclusive to corporate partners and youth service providers), which you either know or suspect is unlawful or otherwise unacceptable. You may have noticed the conduct yourself or you may have been contacted by someone else.

This policy sets out the processes in place to ensure that all persons who work for HRAS International, as defined above, are not penalised for raising genuine concerns, even if those concerns prove to be unfounded. It also provides the means for taking disciplinary action against anyone who is found to have raised false concerns with malicious intent.

This policy runs alongside all existing HRAS International policies.

What is whistleblowing?

Whistleblowing occurs where a concern is raised not as a complaint or feedback to the person(s) directly concerned with the subject matter, but as a confidential report.

It is not possible to provide an exhaustive list of the circumstances that may give rise to a whistleblowing report, and no statutory or regulatory definition exists. However, some examples of the type of conduct (either by HRAS International, its staff or third parties) about which a whistleblowing report might be raised could include the following:

- conduct which is an offence or breach of the law;
- breaches of health and safety or environmental requirements;
- the unauthorised use of charitable funds;
- possible fraud and corruption;
- actions that negatively affect the welfare of children or vulnerable adults (safeguarding);
- sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users;
- abuse of authority;
- other unethical conduct.

In respect of the conduct of HRAS International persons (be that employees, contractors, secondees, volunteers, and the young people employed on HRAS International programmes), a whistleblowing report could include any concern in respect of HRAS International commitment to quality work, professional judgment and values.

Confidentiality

All reports received will be dealt with confidentially and, if you provide personal details, in accordance with the requirements of the Data Protection Act 2018.

Prescribed Persons

Whistle-blowers may wish to make a report to a Prescribed Person if they do not wish to report a concern directly to the employer.

Whistleblowing Procedure

What to do if you wish to raise a concern about malpractice

If you wish to raise a concern specifically about a young person or vulnerable adult, or you wish to raise a concern about any other form of malpractice, you can do so by contacting one or more of our designated responsible whistleblowing individuals/parties by email.

What information to include in your report

We ask that you provide us with as much information as possible, including:

- (i) the reason for your concern.
- (ii) where and when the cause for concern arose.
- (iii) names of those involved (if known).
- (iv) what outcome you are hoping for.
- (v) your contact details.

Please note if you submit a concern anonymously, i.e. do not disclose your identity and/or the identity of the person(s) you have concerns about, we will be unable to take the concern further as we will not have sufficient information to proceed.

Who to send your concern to

Please address your concern in the first instance to the designated responsible whistleblowing individuals/parties listed below.

1. Executive Director - David Hammond david.hammond@hrasi.org
2. Director – Robert Palfrey rp@hrasi.org

What to do if someone raises a concern with you about malpractice

If someone informs you that they are concerned about the actions of another HRAS International person(s), HRAS International supplier(s) or other associated external party (parties), you should reply to them as soon as possible.

1. If you are not a designated responsible whistleblowing individual/party, you should establish why he/she has chosen to discuss the concern with you.

2. You must then inform the person that either you, or they, are obliged to contact one of the designated responsible whistleblowing individuals/parties as soon as possible to make them aware, but you should not refuse to hear what the person has to say.
3. You should make notes of your discussions with the individual and check the accuracy of your notes with him/her.

After discussion, you, or they, must contact one of the designated responsible whistleblowing individuals/parties as soon as possible, following steps 1 - 3 above. You should not take any further action unless otherwise advised by a designated responsible whistleblowing individual(s)/independent external party(parties).

How your concern will be handled

If your claim is not anonymous, the designated responsible whistleblowing individual(s)/party(parties) who you choose to contact from the list above will reply to you within 5 working days (either in writing, by telephone, or in person) to discuss your concern. Should this discussion be held in person, it can take place away from the workplace if necessary.

After discussion, you will be informed as soon as possible of the action that will be taken to address your concern. It may not be possible to disclose the full details of the outcome as it could concern confidential third-party information, however we will share as much information as we are able to with you. If no action is to be taken in relation to your concern you will also be informed of this outcome and provided with the reasons why.

If you do not want the person(s) you have concerns about to know your identity, please make this clear to the designated responsible person(s) with whom you make contact. Every effort will be made to respect your wishes, but it cannot be guaranteed that your identity will not be disclosed. If this is the case, you will be informed beforehand and any issues you may have about this will be discussed with you.

If you need support in raising or communicating your concern, you may bring a work colleague with you to any meetings with the designated responsible whistleblowing individuals/independent external parties.

Conducting a formal investigation

Unless the matter is relatively minor and can be dealt with informally, one of the following designated responsible whistleblowing individual(s)/party(parties) should arrange for an investigation to be completed as swiftly as possible (in order of priority):

1. Executive Director – David Hammond
2. Director – Robert Palfrey

The investigation will be carried out by an impartial 'Investigating Manager' who will ensure that it is demonstrably thorough and impartial.

The scope of the investigation will be determined by the nature of the concern. Witnesses may need to be interviewed and records may need to be scrutinised. It is also possible that advice may be needed from someone with specialist knowledge.

Outcome of the formal investigation

Once the investigation is complete, a report will be produced summarising the nature of the concern, the investigation process and the outcome, including specific recommendations.

Measures will be taken to preserve the anonymity of the person who raised the concern if this has been his/her wish.

If the concern raised is not upheld, this should be made clear.

If the concern is upheld and the person(s) who the claim was raised about is found to have been culpable or remiss in some way, the report's recommendations should be carried out using a clear plan of action. The plan may include the use of disciplinary action, training, coaching, counselling or the implementation of new policies or procedures for the whole workforce.

If it becomes apparent during the course of the investigation that a criminal offence may have been committed, the police will be informed. The HRAS International investigation may have to be suspended on police advice, if they decide that they need to become involved.

The person who raised the concern will be informed of the outcome but not the details of any disciplinary action. They may also be offered support if appropriate.

If the concern is unfounded and the person who raised it is found, through the process of investigation, to have acted maliciously or out of a desire for personal gain, disciplinary action may be considered against him/her.

Monitoring

HRAS International will maintain a Register of allegations raised and the processes adopted for their investigation and resolution.

The statutory period for retaining whistleblowing documentation is six (6) months following the outcome or investigation. If the report is unsubstantiated then any personal information will be deleted immediately.

ENDS.

