



## Whistleblowing Policy

Last Updated: 10 Mar 24

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### Policy Scope

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

This policy aims to enable and encourage staff to raise concerns within FEAST With Us (hereby known as FEAST). It recognises a worker's legal rights to make a protected disclosure to certain prescribed persons or bodies under the Public Interest Disclosure Act 1998 and any subsequent legislation, as incorporated into the Employment Rights Act 1996.

FEAST is committed to creating a safe, open, and transparent workplace culture, where employees are encouraged to raise concerns at the earliest opportunity. FEAST recognises that employees are often the first to realise that there may be something seriously wrong within an organisation.

It is important to FEAST that any fraud, misconduct or wrongdoing by staff of the organisation is reported and properly dealt with. FEAST is committed to tackling malpractice and wrongdoing. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. If any cases of wrongdoing are upheld, they will be seriously dealt with.

FEAST encourages staff to use internal mechanisms for reporting malpractice or illegal acts or omissions by employees or ex-employees. Employees will be listened to, and serious concerns will be investigated.

This policy allows staff to take the matter further if they are dissatisfied with the management response and aims to reassure staff that they will be protected from harassment or victimisation from co-workers or from FEAST for raising concerns.

This policy applies to all staff including temporary, casual and agency staff, work experience, trainees, and apprentices. Other individuals who work or have worked within the organisation, such as former staff, volunteers, the self-employed and contractors, are also encouraged to use it.

For this policy, FEAST recognises that whistleblowing is the passing on of information about wrongdoing at work. The whistle-blower must reasonably believe that they are acting in the public interest.

It is not necessary for the member of staff to have proof that wrongdoing is being, has been, or is likely to be committed. A reasonable belief is sufficient to disclose the concern. The member of staff has no responsibility for investigating the wrongdoing. It is the organisation's responsibility to ensure that an investigation takes place.

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### Categories of Wrongdoing

- A criminal offence (such as insurance fraud or illegal tax evasion).
- A breach of any legal obligation.
- A miscarriage of justice.
- Endangering an individual's health and safety.
- Damage to the environment.
- Deliberate concealment of information about any of the above.

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### Examples of Wrongdoing

- Unsafe working conditions.
- Lack of, or poor, response to a reported safety incident.
- Inadequate induction or training for staff.
- Suspicions of fraud.
- A bullying culture (across a team or organisation rather than individual instances of bullying).

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### Training

FEAST will provide regular refresher training to all managers enabling them to deal with concerns that are raised and is committed to treating all disclosures consistently and fairly.

FEAST will ensure that all new employees, supervisors, and managers will receive induction on the policy and will provide refresher training to all members of staff so that they are aware of whistleblowing law and know how to use this policy.

Adequate resources will be made available to fulfil the aims of this policy. The policy will be widely promoted, and copies will be freely available in the 'Policies' section of MS OneDrive online folders and available at [www.feastwithus.org.uk/policies](http://www.feastwithus.org.uk/policies).

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## Procedure

This procedure is for disclosures about matters other than a breach of your own contract of employment. Matters relating to your contract of employment, should be raised via the grievance procedure.

### Stage 1

In the first instance, any concerns should be raised with the CEO, who will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above.

Your statement will be considered, and you will be asked to comment on any additional evidence obtained. The CEO will take any necessary action, including reporting the matter to the Chair of the Board of Trustees and any appropriate government department or regulatory agency. The CEO will also invoke any disciplinary action required. On conclusion of any investigation, you will be told the outcome and what the charity has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

### Stage 2

You should escalate the matter to the Chair of the Board of Trustees if you are concerned that the CEO:

- is involved in the wrongdoing.
- has failed to make a proper investigation.
- or has failed to report the outcome of the investigations to the relevant person.

The Chair will arrange for a review of the investigation to be carried out, 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 includes:

- HM Revenue & Customs
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission

- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority
- The Competition and Markets Authority
- The Independent Office for Police Conduct

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

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## Harassment & Victimization

A member of staff who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure. FEAST recognises that any so-called ‘gagging’ or confidentiality clauses in settlement agreements or non-disclosure agreements with individuals do not prevent members of staff from making disclosures in the public interest and are void in such circumstances.

If the wrongdoing that the staff member wants to disclose is not included in the list above, advice may be sought from the designated officers (see contacts below) or from an external organisation (see more information) on the use of the appropriate policy.

FEAST understands that raising a concern can be difficult for staff, especially if they fear reprisal from those responsible for the malpractice. FEAST will not tolerate harassment and victimisation of anyone raising a concern, and there should be no impact on the continued employment and opportunities for future promotion or training of anyone raising a concern.

Any such behaviour is a serious breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal.

FEAST will not tolerate any attempt to bully anyone into not raising any such concern. Any such behaviour is a breach of our values as an organisation and, if upheld following investigation, could result in disciplinary action potentially leading to dismissal.

This policy encourages members of staff to put their name to their concerns. Concerns expressed anonymously are harder to follow up and have an effective outcome.

If a member of staff makes an allegation in good faith, but the allegation is not confirmed by the investigation, no action will be taken against that member of staff. They will not be at risk of losing their job or suffering any form of reprisal as a result. Provided the member of staff is acting honestly, it does not matter if they are mistaken or if there is an innocent explanation for their concerns.

However, if we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower may be subject to disciplinary action.

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## Data Protection

When an individual makes a disclosure, we will process any personal data collected in accordance with FEAST's GDPR 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.

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## Further Information & Support

Protect is the UK's whistleblowing charity that aims to stop harm by encouraging safe whistleblowing. They provide a legal advice service and offer free expert and confidential advice on how best to raise a concern and protection as whistle-blower. Visit Protect's website for more information: <https://protect-advice.org.uk>

Protect Advice Line: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

Protect Advice Line: 020 3117 2520 (\* option 1)

UK government advice on 'Whistleblowing for employees' [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)

ACAS guidance on 'Whistle-blowing – Public Interest Disclosure'  
<https://archive.acas.org.uk/index.aspx?articleid=1919>

## **Public Concern at Work (Independent Whistleblowing Charity)**

Helpline: (020) 7404 6609

E-mail: [whistle@pcaw.co.uk](mailto:whistle@pcaw.co.uk).

Website: [www.pcaw.co.uk](http://www.pcaw.co.uk).

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## **Contacting Us**

If you have any questions about this policy, please contact us at [info@feastwithus.org.uk](mailto:info@feastwithus.org.uk).

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Reviewed and approved on 10 March 2024 by Caroline Monkhouse Flower, CEO, and Helen Burgess, Chair of the Board of Trustees, on behalf of the board.

Signed by:



Helen Burgess  
Chair of the Board of Trustees

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