

## **Gympanzees Whistleblowing Policy.**

Gympanzees is committed to operating with honesty and integrity and expects all its workers to operate on this basis and adhere to all other Gympanzees policies and procedures.

This Whistleblowing policy sets out the procedure by which an individual who has a reasonable belief that a wrongdoing has or may be committed in the workplace can safely report it internally and be sure it is acted upon.

The aim of this policy is to encourage everyone to raise genuine concerns to assist in tackling fraud, corruption and other malpractice within Gympanzees and in setting standards of ethical conduct, without fear of victimisation, discrimination, disadvantage or dismissal.

Gympanzees will treat any concerns raised under this policy seriously and deal with them confidentially, responsibly and professionally. An individual raising a genuine concern will not be treated less favourably and will not be subjected to a detriment nor will they be dismissed for doing so.

This policy applies to all workers at Gympanzees, staff, volunteers and trustees, regardless of length of service. It does not form part of the contract of employment and Gympanzees reserves the right to make changes to it from time to time without prior notice.

### 1. Definition of whistleblowing

Whistleblowing is when an individual knows, or suspects, that there is some wrongdoing or malpractice occurring at work and alerts Gympanzees or a relevant authority accordingly.

The sorts of internal wrongdoing or malpractice that Gympanzees is concerned about include:

- Any concern raised with regard to our safeguarding and eSafety Policies.
- any irregularities involving accounting or other financial procedures.
- any conduct which is or may be in conflict with Gympanzees' interests such as involvement with a business competitor.
- any dishonesty or other irregularities in dealing with customers and suppliers.
- a breach, or potential breach, of health and safety legislation i.e. any conduct which endangers the health and safety of employees and others working for Gympanzees.
- harassment of a colleague, customer or other individual.

- damage to the environment;
- the committing of a criminal offence.
- any act of bribery, fraud or corruption.
- deliberate concealment of any of the above;

It is not possible to come up with an exhaustive list of wrongdoing and malpractice and there

may well be other issues of concern that would be considered as such which are not listed here. Individuals are strongly encouraged to raise any concerns they have.

## 2. Raising a concern

If an individual is aware of, or suspects that any sort of malpractice or wrongdoing has occurred, is occurring or is likely to occur within Gympanzees, they should raise the matter immediately with their line manager.

It is important that any concerns are raised internally in order to give Gympanzees the chance to deal with the problem. It would not normally be appropriate to disclose any concerns outside Gympanzees or to a third party without first following the procedure in this policy.

An employee who disregards the Gympanzees' Whistleblowing procedure may be in breach of the obligations of confidentiality which form part of their employment relationship with Gympanzees.

To raise a personal concern relating to an employee's own working conditions and employment, or treatment at work, the Gympanzees Grievance procedure should be followed.

## 3. Investigating a concern

Any individual who is informed of potential wrongdoing or malpractice in the workplace will immediately report the situation to the CEO Stephanie When or another board member in her absence.

The CEO/board member will encourage the individual to provide as much detailed information as possible about their concerns and detail how they have come to be aware of this concern.

In appropriate cases, the CEO/Board member may appoint others (including the police) to investigate the individual's concern. The exact nature of the investigation will depend on the nature of the problem raised.

The person investigating the concern raised will take a detailed note of the concern and, if possible, talk to the individual raising the concern if more details are needed.

The investigation (or part of it) may also be referred to external bodies in appropriate cases.

The individual who has raised the concern will be kept informed of any investigation that is taking place and of the outcome of the investigation where appropriate, including what action, if any, has been taken/will be taken by Gympanzees.

#### 4. Confidentiality

Gympanzees will treat every disclosure in confidence and will investigate all concerns raised anonymously as far as practicable. Anonymous disclosures without sufficient information being provided are inevitably much more difficult to investigate and may make it impossible for Gympanzees to carry out a full investigation or take appropriate action.

If the whistleblower gives their name, the person conducting the investigation will seek to protect their identity as much as possible. However, it may not be possible to guarantee absolute confidentiality in order to fully investigate the concern and in some cases, it may be necessary to reveal the identity of the whistleblower (e.g. if the police or other external bodies are involved or if required in connection with court proceedings).

#### 5. Protection against detriment

If an individual genuinely believes that there is some form of malpractice or wrongdoing occurring within the workplace and raises a concern in accordance with this policy, Gympanzees will ensure that they will not be subjected to a detriment or treated less favourably as a result of raising their concerns. Please note that protection against detriment will apply only if the individual follows the procedure set out in this policy

If it turns out that a genuine concern raised by an individual is unfounded when investigated by Gympanzees and they are mistaken in their belief, no action will be taken against them and their right to be protected from suffering any disadvantage in the workplace as a result will not be affected.

As part of its commitment to tackling malpractice and wrongdoing, and encouraging individuals to report their concerns, Gympanzees will not tolerate the victimization or harassment of anyone raising or intending to raise a genuine concern under this policy.

#### 5. Alerting an external body

An individual should always, in the first instance, talk to Gympanzees about a potential wrongdoing or malpractice. If they are not satisfied with the response, they can contact a relevant external body to express their concern. In doing this, they should have a reasonable belief that:

- the allegation is based on facts and
- it is in the public interest to make the disclosure.

A “relevant body” is likely to be a regulatory body e.g. the Health and Safety Executive/FSA.

In the rare situation that the concern is about the lead safeguarding officer, it is important to refer to a deputy safeguarding officer. This may not be appropriate, in which case the concerned person may refer directly to the Local Authority Designated Officer (LADO).

## 6. False allegations

If an employee raises a concern which they know to be false or raises a concern maliciously or discloses information in an inappropriate way (e.g. contacting the media), disciplinary action may be taken against them, up to and including dismissal in accordance with the Gympanzees Disciplinary Policy.

## 7. Data protection.

Once the whistleblowing procedure has been completed, a record of the concern, the meetings held, the outcome(s) and any action taken (and the reasons for it) will be made and retained on file (confidentially) for a reasonable period of time. These records will be kept confidential and retained in accordance with the Data Protection Act 2018.

E S Scholey 01.03.2022