WHISTLEBLOWING POLICY

Date of last review	June 2026	**Date of next review**	June 2029
Review period	Three years	**Owner**	Audit & Risk Committee
Policy type	Statutory		

This Whistleblowing Policy has been produced in accordance with the Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998 and the Employment Rights Act 2025, and is designed to sit alongside Paradigm Trust's Child Protection Policy, Complaints Policy, Financial Code of Practice and Grievance Procedure.

1. Introduction and purpose.

1.1. The Directors and staff at Paradigm Trust (The Trust) operate all aspects of the Trust activities with full regard to high standards of conduct and integrity. Any suspected wrongdoing should be reported as soon as possible.

1.2. This policy covers all employees, directors, consultants, contractors, volunteers, interns, casual workers and agency workers. It is designed to provide a mechanism for the reporting of public interest disclosures, and to protect 'whistleblowers' from dismissal or unfair treatment as a result. It does not prescribe the process for investigating concerns raised under this policy since this may vary according to each case.

1.3. Throughout this policy, the term "whistleblower" denotes the person raising the concern or making the complaint. It is not meant in a pejorative sense.

1.4. The Trust is committed to tackling any form of malpractice or other wrongdoing and treats these issues seriously. It is committed to a climate of trust and openness so that a person who has raised a concern in good faith can raise the matter with full confidence that the matter will be appropriately considered and resolved.

1.5. The provisions of this policy apply to matters of actual or suspected malpractice or other impropriety and not matters of more personal grievance that would be dealt with under the Trust's grievance procedures.

1.6. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. What is Whistleblowing?

2.1. Whistleblowing is the reporting of suspected wrongdoing or dangers that are 'in the public interest' in relation to our activities. By law, there are several issues you can whistleblow about. These are called 'qualifying disclosures'.

These include:

- a criminal offence – for example, an employer committing fraud
- a breach of a legal obligation – for example, an employer does not have the right insurance

- a miscarriage of justice – for example, a worker has identified evidence that was not provided to a court that they reasonably believe would have changed the outcome of a case
- someone's health and safety is in danger – for example, customers have been served contaminated food
- damage to the environment – for example, new business activities are likely to pollute local rivers
- sexual harassment – for example, a worker sexually harasses other workers
- the deliberate concealment of information tending to show any of the above

2.2. A whistleblower is a person who raises a genuine concern relating to the above.

2.3. Not all concerns about the Trust count as whistleblowing. For example, personal staff grievances such as bullying or harassment do not usually count as whistleblowing. If something affects a staff member as an individual or relates to an individual employment contract, this is likely to be a grievance.

2.4. When staff have a concern, they should consider whether it would be better to follow the staff grievance or professional reflection (low-level concern) procedures.

2.5. Protect (formerly Public Concern at Work) has:
- Further guidance on the difference between a whistle-blowing concern and a grievance that staff may find useful if unsure
- A free and confidential advice line

3. How to raise a concern

3.1. We hope that in many cases you will be able to raise any concerns with your Manager, Principal or Service Head. However, if you prefer not to raise it with your manager for any reason, you should contact the CEO or the Chair of the Audit and Risk Committee. If the concern relates to the CEO, you should contact the Chair of the Audit and Risk Committee. In the event that the concern relates to a director, or the board of directors, or about the Trust's general governance, you should contact the Trust's internal auditors. Contact details are provided at the end of this policy.

3.2. A meeting will be arranged with you as soon as possible to discuss your concern(s). You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

3.3. Following the meeting, the whistleblower may be provided with feedback. The level of detail provided to the whistleblower may vary, balancing the need for confidentiality whilst demonstrating that the concern has been properly considered.

4. Confidentiality

4.1. We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, wherever possible it will be treated in strict confidence and anonymity will be respected.

5. External disclosures

5.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, you will probably not find it necessary to alert anyone externally.

5.2. However, the law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. You are encouraged to seek advice before reporting a concern to anyone external. You can contact Protect (Formerly Public Concern at Work), an independent charity providing advice to those who feel that they have a concern they wish to raise under whistleblowing. Their contact details are at the end of this policy.

6. Protection and support for whistleblowers

6.1. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

6.2. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the CEO, or in the case of a concern relating to your poor treatment by the CEO, the Chair of the Audit and Risk Committee immediately.

6.3. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

6.4. However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

6.5. Protect a Whistleblowing Charity operates a confidential helpline. Their contact details are at the end of this policy.

7. Contacts

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