



Whistleblowing Policy

It is important to EventWell that any fraud, misconduct or wrongdoing by employees, volunteers or others working on behalf of EventWell is reported and properly dealt with. Therefore, EventWell requires all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which it is run.

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

A whistleblower is a worker and reports certain types of wrongdoings. The wrongdoing you disclose must be in the public interest. As a whistleblower you are protected by law and will not be treated unfairly or lose your job. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future

1. Types of concerns

The policy is intended to deal with serious or sensitive concerns about wrongdoings such as the following:

- a criminal offence, for example fraud;
- someone's health and safety is in danger;
- risk or actual damage to the environment;
- a miscarriage of justice;
- the company is breaking the law, for example does not have the right insurance;
- you believe someone is covering up wrongdoing.

Personal grievances (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public interest.

This policy does not deal with any complaints staff may have about their employment. This should be dealt with through the Organisation's Grievance Procedure.

2. How to raise a concern in the workplace

- The officer designated to handle whistleblowing concerns is the Chief Executive and shall be known as the whistleblowing officer;

- ❑ In most cases individuals should report their concern to the whistleblowing officer. If they are unable to deal with the matter they will refer the concern to the Company Directors;
- ❑ If necessary, the individual can report straight to a company director;
- ❑ Individuals are encouraged to raise their concerns in writing where possible, setting out the background and history of their concerns (giving names, dates and places where possible) and indicating the reasons for their concerns.

3. Protecting the individual raising the concern

If an individual raises a concern which they believe to be true, the Organisation will take appropriate action to protect the individual from any harassment, victimisation or bullying.

Those who raise a genuine concern under this policy will not be at risk of losing their job, nor will it influence any unrelated disciplinary action. However, if an individual knowingly or maliciously makes an untrue allegation, the organisation will take appropriate disciplinary action against them. It may constitute gross misconduct.

It will be treated confidentially but if the concern cannot be resolved without revealing the individual's identity, the whistleblowing officer will discuss with the individual whether and how to proceed.

Individuals should note that they will not be protected from the consequences of making a disclosure if, by doing so, they commit a criminal offence.

4. How the Organisation will deal with the concern

How the concern will be dealt with will depend on what it involves. It is likely that further enquiries and/or investigation will be necessary. The concern may be investigated by the Organisation's whistleblowing officer, through the disciplinary process or it may be referred to the police, other agencies, an external auditor or an independent investigator. It may be necessary for the individual to give evidence in criminal or disciplinary proceedings.

The Organisation will give the individual feedback on the progress and outcome of any investigation wherever possible.

If the suspicions are not confirmed by an investigation, the matter will be closed. The Whistleblower will not suffer any detriment for raising the concern. If on conclusion of the internal procedures you reasonably believe that the appropriate action has not been taken, you should report the matter to the proper authority. The legislation sets

out a number of bodies to which qualifying disclosures may be made. These can be found from [this link](#).

5. Disclosure Procedure

A Whistleblower should preferably make a disclosure in writing (including email) but may instead do so by telephone or in person. A Whistleblower does not have to provide evidence about their concern, but they will generally need to provide at least the following:

- the nature of their concern and why they believe it to be true; and
- the background and history of their concern (where possible).

6. The Investigation

Provided that a concern is reported by a Whistleblower in accordance with above, it will be without Detriment to them. Their identity, the concern, and the information disclosed by them, will thereafter be kept confidential by the organisation so long as it does not hinder or frustrate initial enquiries, or any subsequent investigation carried out.

There will be an initial enquiry by the person to whom the concern is disclosed, to resolve the issue informally if possible. If that is not possible within 5 working days after the initial report of the concern, there will be a two-stage investigation process, as follows. No precise timescale can be laid down for how long the investigation will take.

Stage 1: within 10 working days after the report of a concern is made, the organisation will confirm that the investigation will take place and will be in confidence and without Detriment to the Whistleblower, and the Supervisor or other person to whom the disclosure is made will investigate it with the Whistleblower and document the relevant surrounding facts relating to the concern; and

Stage 2: On completion of the investigation, the person who has carried out the investigation will provide all information gathered in the investigation and will pass it to the Chief Executive so that they can consider the matter in full and decide on what if any further action should be taken in line with the Act and other relevant good practice and policies.

Where the investigation concludes that there has been some malpractice, further action may include disciplinary proceedings for one or more of the persons involved in it.

Where possible, the organisation will inform the Whistleblower of all matters in relation to the investigation including any course of action decided.

7. Matters Relating to the use of the Procedure

Where a Whistleblower makes a disclosure, they do not have to prove the truth of the allegations they make when disclosing their concern. They may even be mistaken about it, but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.

A Whistleblower will suffer no detriment from the organisation due to their making such a disclosure if they make their disclosure in accordance with this procedure but if they fail to follow this procedure, it may result in the disclosure of information losing its “protected status”.

The organisation is committed to dealing with a concern raised by a Whistleblower pursuant to this Policy as quickly as possible, in an appropriate, fair and professional manner.

For further guidance in relation to use of the disclosure procedure, a Whistleblower should speak in confidence to the Chief Executive.

8. Other Means of Disclosure

Internal

A Whistleblower may instead report a concern about the organisation’s conduct to the Chief Executive.

External

Whistleblowers are encouraged to report a concern internally rather than externally, and they should normally do so, but if a Whistleblower feels that they cannot reasonably do so, then they may instead raise it with:

“Public Concern at Work”, a charity which aims to empower individuals to speak up about wrongdoing in the workplace, and it can provide advice to a Whistleblower; or the Fundraising Regulator. In order that it can act, it will first require the Whistleblower’s consent to contact the organisation.

Wider Disclosure

In certain exceptional circumstances, there may be wider disclosure, e.g. to a Whistleblower’s MP, or to the police, or to the press. However, a whistleblower should

seek advice from “Public Concern at Work” or a legal adviser before considering making such a disclosure, and in that connection please note that unjustifiable wider disclosure could result in disciplinary or legal action by the organisation against the Whistleblower.