



Family Link



Our mission: The provision of leisure opportunities for children and young adults with disabilities.

WHISTLEBLOWING POLICY

Policy Statement

Family Link is committed to the highest standards of integrity, honesty, and accountability in the delivery of our services to children and young people with disabilities and complex needs.

This policy provides a framework for workers to raise concerns about suspected wrongdoing or malpractice safely and confidentially, without fear of reprisal. Whistleblowing helps protect children, staff, volunteers, and the organisation itself while promoting transparency and trust.

Scope

This policy applies to all:

- Employees, volunteers, interns, agency staff, and work-placement students
- Trustees and other representatives working on behalf of Family Link

Throughout this policy, these groups are collectively referred to as “workers”.

This policy does not replace grievance or bullying and harassment procedures, which should be used for employment-related issues or interpersonal disputes.

Legal Framework

This policy is informed by:

- Public Interest Disclosure Act 1998
- Employment Rights Act 1996 (sections 44 & 100)
- Human Rights Act 1998

It also complements Family Link’s Safeguarding, Health & Safety, and Financial Policies.

What Constitutes Whistleblowing

Workers should raise concerns when they reasonably believe that malpractice has occurred, is occurring, or is likely to occur. Examples include, but are not limited to:

- Criminal offences (e.g., theft, fraud, corruption)



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- Breaches of legal obligations, including Charity Commission or financial regulations
- Threats to the health, safety, or wellbeing of children, staff, or visitors
- Damage to the environment or property
- Breach of Family Link's principles, including bullying, harassment, or discrimination
- Deliberate concealment of any of the above

Concerns about personal employment matters should be raised through the Grievance Policy.

Responsibilities

Trustees / Senior Management are responsible for:

- Ensuring this policy is effectively implemented
- Providing guidance to managers on investigations
- Protecting whistleblowers from retaliation

Line Managers / Supervisors are responsible for:

- Communicating the policy to staff
- Receiving, acknowledging, and investigating concerns promptly and objectively
- Keeping whistleblowers informed of progress
- Taking appropriate action to address verified concerns

Workers are responsible for:

- Reporting concerns honestly and in good faith
- Providing sufficient factual detail to support the investigation
- Cooperating with investigations while respecting confidentiality

Raising a Concern

Internal reporting:

1. Raise your concern with your immediate line manager or supervisor, either in writing or verbally.
2. If your concern involves your line manager, escalate to their line manager or the Project Manager.
3. If the concern involves senior management or trustees, escalate directly to the Board of Trustees.
4. For health and safety concerns, the Play Leader or Project Manager should be notified.



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External reporting:

If you reasonably believe that:

- You will be treated detrimentally by raising the concern internally,
- Evidence may be destroyed or concealed, or
- Your concern has not been adequately addressed internally

You may report your concern to an external regulator or agency, such as:

- Charity Commission
- Health & Safety Executive
- HMRC
- Information Commissioner's Office
- Public Concern at Work (www.pcaw.org.uk)

Confidentiality and Protection

- Family Link will treat all disclosures confidentially wherever possible.
- Whistleblowers will not suffer retaliation, victimisation, or any detriment for raising concerns in good faith.
- Anonymity is permitted, but providing your identity may help with investigation.
- Malicious or knowingly false reports may result in disciplinary action or termination of engagement.

Investigation Process

- Concerns will be acknowledged within 5 working days of receipt.
- An investigation will be conducted promptly, fairly, and objectively.
- The whistleblower will be kept informed of progress, without compromising confidentiality.
- Investigation outcomes will be reported to the Board of Trustees as appropriate.
- Corrective actions will be taken where concerns are substantiated.

Record Keeping

- All reports, investigations, and outcomes will be documented and stored securely in line with GDPR and organisational record-keeping requirements.



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Monitoring and Review

This policy will be reviewed annually or sooner if legislation, best practice guidance, or organisational changes require.

Policy approved and adopted by the Family Link Board of Trustees

On the: 21 June 2023

Reviewed: 8th January 2026 by Trustee – Paula Hollywood

Current Play Leader – Kenzie / Megan / Renée / Emma

Current Safeguarding Trustee – Julia James – 07894 672019

Policy due for review: 8th January 2027

APPENDIX A

Worker Guidance on Whistleblowing

Determining whether to use the Whistleblowing Policy

- This quick question section may help you to determine whether you should use the whistleblowing procedure.
- Does malpractice fall under one of the following?
- A criminal offence, including theft, fraud, or corruption.
- A failure to comply with a legal obligation, namely those under the Charity Commission or financial regulations.
- A miscarriage of justice.
- The endangerment of an individual's health and safety, and well-being: this would include towards staff member, worker, young person, or visitor to Family Link.
- Damage to the environment or conduct, which conflicts with Family Links interests.
- Deliberate disregard or serious breach of Family Link's principles and values, including bullying and harassment, and discrimination.
- Deliberate concealment of information to any of the above.
- Do you have genuine reason to believe that malpractice occurred either in the past, recently, or is likely to occur in, the near future?
- What details do you have? Check that the details are not judgements or assumptions but based on fact.
- Do you feel vulnerable or at risk?
- Letting someone know



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As soon as you become aware of or have good reason to believe that malpractice either has occurred, is occurring or likely to occur by an employee, volunteer, contractor, or agency worker within Family Link, raise your concern with an appropriate member of staff within Family Link. In the first instance, this would normally be your immediate line manager/senior member. You can make a report either orally or in writing.

- If the malpractice concerns your line manager/senior member, then raise your concern with their line manager.
- If you believe the malpractice is within your line management structure then raise your concern with the Trustees, who will investigate.
- If the malpractice is regarding health and safety, raise your concern with the Play Leader or Project Manager, who has delegated responsibility for health and safety matters within Family Link.
- If you genuinely believe that you will be subjected to detrimental treatment if you report the concern to an appropriate person within Family Link, or that making a disclosure to someone within Family Link will result in destruction or concealment of evidence relating to the concern, or you believe that your concern was not dealt with satisfactorily by Family Link, you may raise your concern with an external body.

Providing details about your concern

As soon as you become aware of or suspect malpractice, you have a duty to inform an appropriate person of your concern. If it is later found that you were aware of malpractice and had withheld information, this may have serious consequences for you.

When reporting your concern, you will be required to give your name, your position, and details about the concern, including any evidence that you have, to support the concern. This will enable the best possible investigation.

Your position

- If you want to raise the matter in confidence, please make this clear when you make the report so that the appropriate arrangements can be made. Alternatively, you may make a report anonymously but please note that it is much harder (and sometimes impossible) to investigate suspicions without having direct access to the individual who raised the concern. It is best to declare your identity if possible.
- If you genuinely believe that malpractice has occurred, is occurring or likely to occur, Family Link will ensure that you do not suffer any disadvantage in the workplace as a consequence of raising your concern.
- If you raise a concern which is later found that you knew, to be false and/or raise a concern out of malice, then disciplinary action will be taken and may result in your dismissal. For those who the disciplinary process does not apply (for example



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contractors/consultants), steps will be taken to terminate the relationship with Family Link.

Next steps

- The concern will be investigated by the person to whom it is raised. All workers called upon to assist the investigation will have a duty to co-operate and may request that their concerns are treated in confidence: again, such wishes will be respected.
- The investigating manager will provide regular information to the worker who raised the concern on the progress of the investigation up until an outcome has been reached. Please note that this does not necessarily mean that the outcome of the investigation will be divulged to the worker, especially when relating the privacy of another individual.
- The investigating manager will forward all original investigation material to the Board of Trustees for further action as appropriate and/or storage.
- The investigating manager will monitor and ensure that appropriate steps are taken to address the cause for concern.
- Family Link will respect and heed any legitimate concerns about your own safety or career and will seek not to disclose your identity without your express consent. Any attempt to victimise an employee for having raised a concern about malpractice, or to deter anyone from raising such a concern, is a serious disciplinary offence.
- We will do everything possible to keep your identity secret (if you so wish) but there may be circumstances when you may be needed as a witness (for example, if your report becomes the subject of a criminal investigation). Should this be the case, we will seek to discuss the matter with you at the earliest opportunity.

APPENDIX B

External Sources of Information and Advice

Whilst this is not an exhaustive contact list, it aims to provide the key contacts in relation to CIUK's business.

The Charity Commission for England & Wales

Matters in respect of the proper administration of charities and funds given or held for charitable purposes.



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Charity Commission

Liverpool Head of Operations
2nd Floor
20 Kings Parade
Queens Dock
Liverpool, L3 4DQ

Tel: 0870 333 0123
Fax: 0151 703 1556

Chief Executive of the Criminal Cases Review Commission

Actual or potential miscarriages of justice:

Criminal Cases Review Commission
Alpha Tower
Suffolk Street
Queensway
Birmingham
B1 1TT

Tel: 0121 633 1800
Fax: 0121 633 1804
Email: info@ccrc.gov.uk

The Commissioners for Her Majesty's Revenue & Customs

Value added tax, insurance premium tax, excise duties and landfill tax. The import of prohibited or restricted goods.

Income tax, corporation tax, capital gains tax, petroleum revenue tax, inheritance tax, stamp duties, national insurance contributions, statutory maternity pay, statutory sick pay, tax credits, child benefits, collection of student loans and the enforcement of national minimum wage.

Her Majesty's Revenue & Customs

Cross Cutting Policy
Room 1E/04
1 Parliament Street



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London
SW1A 2BQ

Tel: free phone 0900 595 000
Fax: free fax 0800 523 0506
Email: customs.confidential@hmrc.gov.uk

Health & Safety Executive

Matters which may affect the health and safety of any individual at work; matters which may affect the health and safety of any member of the public arising out of, or in connection with, the activities of persons at work.

Health & Safety Executive
Information Services
Caerphilly Business Park
Caerphilly South Wales, CF38 3GG

Tel: 0845 345 0055
Fax: 0845 408 9566
Email: hse.infoline@natbrit.com

Information Commissioner

The compliance with the requirements of legislation relating to data protection and to freedom of information.

Data protection legislation regulates the processing of information relating to individuals, including the obtaining, holding, use of or disclosure of such information.

Freedom of information applies to public authorities about disclosure of information that they hold.

The Office of the Information Commissioner

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 01625 545700
Fax: 01625 524510
Email: mail@ico.gsi.gov.uk



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Recognising that employees have a lot at stake when considering whether to and how to blow the whistle can seek independent advice from Public Concern at Work. Its website:

www.pcaw.co.uk

APPENDIX C

Whistleblowing process flow chart

