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Fundra Policy

1. Introduction and Definitio

1.1

"Act" est Disclosure Act 1998;

"Code" g Regulator's Code of Fundraising

"Detriment" victimisation, harassment, advantage due to reporting a is Policy;

"Policy" g Whistleblowing Policy;

"Supervisor or, line manager or immediate eblower;

"Volunteer" e Charity;

"Whistleblower" or employee of the Charity who , pursuant to this Policy, report any elation to the Charity's fundraising

"Whistleblowing Policy" blished internal procedure for staff ndraising organisations enabling oncerns they may have regarding draising practice.

1.2 **Charity Commiss (7th June 2016)**
CC20 sets out th ity trustees should follow to help meet their respon undraising.

1.3 **The Code**
CC20 requires tru w recognised standards that apply to their charity's the standards in the Code. The Commission expe raise to fully comply with the Code.

The Code outline y to fundraising and the standards designed to ensu pen, honest and respectful. The Code states that ns must have a Whistleblowing Policy, and that c Whistleblowing Policy available to staff and volunte Fundraising Regulator expects all charities to have in place by 30th November 2017. The Code outlin m) a Whistleblowing Policy must include.[1] A Whistl to a charity's fundraising may be a

[1] The Code requires the following to be
(i) the type of issues that can b
(ii) how the person raising a co on and harassment;
(iii) how and what the organisat h information;

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standalone policy stleblowing policy adopted by the charity.

1.4 **This Policy and i**

The Charity is c n, honest, and accountable, and encouraging a fre dealing between the trustees and the employees an <<Insert Charity Name>>.

It is in the pub e interest of the Charity that a Whistleblower sh for reporting concerns about its conduct of fundr rotection from being subjected to disciplinary action t as a result. This Policy therefore sets out the Char re as to how a Whistleblower may report such conc y will be protected by the Charity from any such a concern reported by them in accordance with t

The Charity has i suant to the Charity Commission's and the Code's re complies with the Code.

1.5 **Scope of the Act**

Protection from D nder the Act for an employee of a charity who report s wrongdoing at their charity if that wrongdoing relate inal offence, danger to health and safety etc. How nder the Act does not include fundraising, and c nteer.

In view of the Ac arity has, by means of this Policy, provided a proced olunteers to report concerns about fundraising. Wher ure, they will be protected against Detriment by the e an employee or a Volunteer. This Policy only applie ising conduct of the Charity. In this way, this Policy su

This Policy does nce – a grievance relates to a complainant's c sonal circumstances, whereas Whistleblowing re making a report but instead to a general concern st aspect to it. **[**A grievance should be dealt with by re in the Charity's employee and Volunteer grievar g the procedure in whichever is applicable either t ievance procedure or its Volunteer grievance proced Supervisor as a grievance**]**.

1.6 **Confidential Info disclosures'**

Employees and V erly carrying out their duties, have access to, or com mation of a confidential nature but, except in the pro duties, they must not disclose, or make use of in an confidential information.

However, the Act make a "protected disclosure" (as defined in the Ac and the Charity allows Volunteers as well as employ olicy.

Whistleblowing pr er the Act (and also by the Charity under this Policy , in the reasonable belief of the Whistleblower ma r this Policy, is made in the public interest.

(iv) how an individual can escal ce to the Fundraising Regulator or the Independent Fundraising Standards and event that internal consideration is not possible.

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This Policy provid protected" if it relates to a specific subject matter wl ade in an appropriate way, i.e. if made in accordar

2. Specific Subject Matter

If in the course of their c Whistleblower becomes aware of information which they re the public interest to disclose and tends to show one or mo ation to the Charity and its conduct of fundraising:

2.1 a criminal offence r bribery) has been committed, is being committed d;

2.2 a person has fai to fail to comply with any legal, professional or re n to which he is subject;

2.3 **[**a person has fa ely to fail to protect children or vulnerable adults**]**

2.4 a miscarriage of ju curring, or is likely to occur;

2.5 the health or safe been, is being, or is likely to be, endangered;

2.6 the environment, ikely to be, damaged;

2.7 **[**there is or has be tice or impropriety;**]**

2.8 there is or has b de or there is likely to be such a breach; or

2.9 there is or has b amage the reputation or financial wellbeing of the C

2.10 information tendi above is being, or is likely to be, deliberately conce

they should use the Char e as set out below.

3. Disclosure Procedure

3.1 If a Whistleblowe t information tends to show one or more of the above isclose it to their Supervisor. If it is inappropriate for make such a disclosure to their Supervisor (e.g. i isclosed relates to wrongdoing by their Supervisor o serious nature), the Whistleblower should instead o <<e.g. a trustee or the chief executive>>.

3.2 However, if the sed relates to wrongdoing by a member of senio tleblower should instead make the disclosure to <<e a trustee>>. If it relates to <<e.g. the chief executiv d make the disclosure to the Chair of trustees of the trustee, they should instead make the disclosure to it relates to the Chair of trustees, they should instea <<e.g. the chief executive>>.

3.3 **[**A Whistleblower e a disclosure in writing (including email) but may y telephone or in person.**]** **[**A Whistleblower mu n writing (including email).**]**

3.4 A Whistleblower c evidence about their concern, but

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they will generally the following:

3.4.1 the nature they believe it to be true; and

3.4.2 the backg concern (where possible).

4. The Investigation

4.1 Provided that a c Whistleblower in accordance with paragraphs 2 and ut Detriment to them. Their identity, the concern, and d by them, will thereafter be kept confidential by th does not hinder or frustrate initial enquiries, or any n carried out under this paragraph 4.

4.2 There will be ar person to whom the concern is disclosed, to resc if possible. If that is not possible within <<e.g. 5 w initial report of the concern, there will be a two-stag , as follows. No precise timescale can be laid down ation will take.

4.3 *Stage 1*: **[**within ys after the report of a concern is made**]**, the Chari vestigation will take place and will be in confidence t to the Whistleblower, and the Supervisor or oth isclosure is made will investigate it with the Whistle the **[**relevant**][**surrounding**]** facts relating to the cor

Stage 2: On com n, the person who has carried out the investigation n gathered in the investigation and will pass it to <<s thin the Charity>> so that they can consider the matt what if any further action should be taken in line with t good practice and policies.

4.4 Where the invest here has been some malpractice, further action ma oceedings for one or more of the persons involved

4.5 Where possible, he Whistleblower of all matters in relation to the inv course of action decided.

5. Matters Relating to the

5.1 Where a Whistle re, they do not have to prove the truth of the allega isclosing their concern. They may even be mistake must reasonably believe that the disclosure is mad and that the information they have tends to show sor

5.2 A Whistleblower om the Charity due to their making such a disclosur sclosure in accordance with this procedure but if procedure, it may result in the disclosure of infor ed status".

5.3 The Charity is co concern raised by a Whistleblower pursuant to this ssible, in an appropriate, fair and professional man

5.4 For further guida of the disclosure procedure, a

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Whistleblower sh nce to <<state position e.g. HR manager>>.

6. Other Means of Disclos

6.1 **Internal**
A Whistleblower r cern about the Charity's conduct of fundraising to th t][and[Risk] Committee] [Internal Auditor].

6.2 **External**
Whistleblowers a t a concern internally rather than externally, and th o, but if a Whistleblower feels that they cannot reasc ay instead raise it with:

6.2.1 "Public C charity which aims to empower individuals gdoing in the workplace, and it can provide ad or

6.2.2 the Fundra r that it can act, it will first require the Whistl tact the Charity; or

6.2.3 the Charity

6.3 **Wider Disclosur**
In certain excepti re may be wider disclosure, e.g. to a Whistleblower' e, or to the press. However, a whistleblower sho Public Concern at Work" or a legal adviser before co disclosure, and in that connection please note that losure could result in disciplinary action by the Cha ower.

I/we confirm that this Policy h authorised by the trustees of the Charity:

Name: <<Inse

Position: <<Inse of Trustees, Human Resources Manag

Date: <<Dat

Signature:

[2] Whistleblowers can raise concerns with the Com ce it is the regulatory body prescribed by the Act for matters relating to proper administration of charitie purposes.

[3] Wider disclosure might be made, for example, w onably believes he will suffer Detriment if he raises the matter internally or with the Charity Commission; (sed with the Charity or the Charity Commission; or (c) the concern is of an exceptionally serious nature.

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