



Whistleblowing Policy 2020

Policy drafted	January 2020
Board approval	18th March 2020
Policy review	March 2021
Policy updates	

Purpose and scope

Parks for London is committed to conducting its business with honesty and integrity and to creating and maintaining a culture of openness and accountability. Parks for London recognises the negative effect which malpractice can have on an organisation and has implemented this Policy with the intention that harm can be identified early and appropriate action can be taken; this is to, protect the Charity, those within it and the organisations we work with.

We encourage staff to raise genuine concerns, or any suspicions relating to misconduct, as soon as possible. Staff should feel confident that their concerns will be taken seriously, investigated appropriately and that their confidentiality will be respected.

This Policy is intended to cover concerns that are **made in the public interest**. If the matter is of an individual or personal nature or relates to discrimination, victimisation or harassment it should be pursued through the Charity's Grievance or Harassment Procedures. The Policy applies to staff employed by Parks for London it does not apply to staff that are self-employed.

What is Whistleblowing

A whistleblower is a worker who passes on information about a company's wrongdoing to the organisation or in some cases to a third party. The act of passing that information is known as "blowing the whistle" or "making a disclosure." Whistleblowers are protected by law, under the Employment Rights Act (1996) and the amendments made in the Public Interest Disclosure Act (1998). To get that protection, the worker must reasonably believe that they're acting in the public interest and they also need to believe the information they are disclosing shows past, present, or future wrongdoing in one or more of the categories given below under disclosures.

Disclosures under this Policy

Staff can make a disclosure under this Policy if they have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:

- Criminal activity;
- Miscarriages of justice;
- Practices endangering health and safety;
- Practices damaging the environment;
- Failure to comply with a legal obligation;
- Bribery;
- Financial malpractice, impropriety or fraud;
- Attempts to conceal any of the above.

Staff are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against staff if they raise genuine concerns in good faith, even if the concern raised is not confirmed by any subsequent investigation.

Protection

Parks for London wants to reassure staff that those who voice concerns will not suffer any detrimental treatment (such as disciplinary action or dismissal). Further, victimisation, harassment, bullying or any other detrimental treatment of a worker who has made a disclosure under this Policy, will not be tolerated and may be dealt with under the Disciplinary Procedure. Should a member of staff feel they have suffered any detriment because of raising a concern under this Policy they should contact the CE or designated trustee.

Staff making disclosures are protected under the Public Interest Disclosures Act 1998, more information can be found from the independent whistleblowing charity Protect [here](#).

Confidentiality and Anonymity

Any disclosure made under this Policy will be treated sensitively and taken seriously and as far as reasonably practicable confidentially. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to the individual.

Parks for London would like to encourage staff to voice any concerns openly, however, disclosures can be made anonymously; it should be noted that it may not in all cases be possible to treat concerns expressed anonymously as effectively as open disclosures, as they can be more difficult to investigate.

How to make a disclosure

In the first instance, you should bring the matter to the attention of the CE, who will bring it to the attention of the Chair of the Board. If the disclosure contains allegations about the CE or the malpractice occurs at this level, you may make the disclosure directly to the designated trustee. If your disclosure contains allegations which you do not wish to make to the designated trustee you should seek advice from the Admin and Finance Manager.

If the disclosure regards a very serious allegation all Board members will be notified by the Chair.

Disclosures may be made in person or in writing. Following the disclosure and prior to an assessment of the matter, Parks for London will:

- Arrange a meeting with the employee to discuss the concern; the employee may bring a colleague or other appropriate representative to any meetings under this Policy. The employee and companion, if applicable, must respect the confidentiality of the employee's disclosure and any subsequent investigation.
- A written summary of the concern will be taken and attendees at the meeting will be provided with a copy after the meeting.
- Parks for London will aim to give an indication of how it proposes to deal with the matter.

The law recognises that in some circumstances it may be appropriate for an employee to report concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. Parks for London strongly encourages employees to seek advice before reporting a concern to anyone external. **Protect** have a free advice line which

employees may find helpful and they also have a list of prescribed regulators for reporting certain types of concern.

All contact details mentioned above are given at the end of this policy.

Investigation

Once a concern has been raised, it will be investigated by Parks for London appropriately, if the member of staff has not made the complaint anonymously, they may be asked to attend further meetings as part of the investigation.

The member of staff will be kept informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind any confidentiality obligations that apply. Please note that details of any disciplinary action, may not be given unless it is considered appropriate.

Dissatisfaction with the outcome of the process

If a person making the disclosure is dissatisfied with the outcome of the investigation, they should raise this with the Chair of the Board, giving the reasons for their dissatisfaction. The Chair will respond in writing notifying them of acceptance or rejection of the need for further investigation and the reasons for this.

Breach of this Policy

If Parks for London concludes that the whistle-blower has made false allegations maliciously, in bad faith or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

Policy Review and Implementation

The Board of Trustees has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under it.

The Administrative and Finance Manager (AFM) has day-to-day operational responsibility for this Policy, and must ensure that all staff receive a briefing to ensure that they are fully aware of their rights and responsibilities under this Policy. Appropriate training may be provided as necessary. The Policy will be made available to staff via the Parks for London website.

The AFM in conjunction with the Board will review this policy from a legal and operational perspective at least once a year.

Contacts

Tony Leach CE:	tony.leach@parksforlondon.org.uk
Nigel Thorne, Chair of the Board:	Chair@parksforlondon.org.uk
Designated Trustee	Designated.Trustee@parksforlondon.org.uk
Admin and Finance Manager	nina.obhrai@parksforlondon.org.uk

Protect (formerly Public Concern at Work) is a charity which leads on whistleblowing. You can find more information [here](#) , including details about their free advice line.