



Whistleblowing Policy

FACE – Family and Community Enterprise | Registered charity 1179629 | Working as FAM

Head office: Central Buildings, Richmond Terrace, Blackburn, BB1 7AP | Applies at head office and all FAM outreach sites

REFERENCE	VERSION	OWNER	REVIEW
FAM-PE-17	1.0 (September 2026)	Chair of Trustees	Annually

Status: approved by the Board of Trustees on 10 September 2026.

Our commitment

FAM wants everyone who works or volunteers with us to feel safe to speak up about wrongdoing. We will take concerns seriously, look into them properly and protect people who raise them in good faith. No one will be punished for raising a genuine concern, even if it turns out to be mistaken.

1 Purpose and scope

- 1.1** This policy explains how staff, volunteers, trustees, sessional workers and contractors can raise concerns about wrongdoing at FACE – Family and Community Enterprise (registered charity 1179629), working as FAM, and how the charity will respond.
- 1.2** Whistleblowing means raising a concern about wrongdoing, danger or illegality that affects others or the public, rather than a personal complaint about your own treatment. Personal complaints about your employment follow the Grievance and Disciplinary Procedure; volunteers' personal concerns follow the Volunteer Policy.

2 What you can raise

- 2.1** You can raise any concern that something wrong is happening, has happened or is likely to happen, including:
 - a criminal offence, such as fraud, theft or bribery;
 - failure to protect children, young people or adults at risk, or covering up safeguarding concerns;
 - danger to anyone's health and safety;
 - failure to meet a legal obligation, including charity law, employment law or data protection law;

- misuse of charity funds or grants, including spending restricted funds on the wrong purpose;
- trustees or staff acting with an undeclared conflict of interest;
- a miscarriage of justice;
- damage to the environment;
- deliberately hiding any of the above.

2.2 You do not need proof. You only need a reasonable belief that there is wrongdoing. It is not your job to investigate.

Safeguarding concerns

2.3 If you are worried that a child or adult is being harmed, or that a staff member or volunteer has behaved in a way that has harmed or may harm someone, report it straight away under the Safeguarding Children and Young People Policy or the Safeguarding Adults at Risk Policy. If you feel the Designated Safeguarding Lead (DSL) has not acted, or is involved, raise it with the Safeguarding Trustee or the Chair of Trustees, or go directly to the local authority where the child lives or where the concern arose, the Local Authority Designated Officer (LADO), or the police.

3 The law and your protection

- 3.1** The Public Interest Disclosure Act 1998 protects workers who make a "qualifying disclosure" in the public interest. If you are an employee or worker and you raise a concern in the right way, it is unlawful for the charity to dismiss you or treat you badly because of it.
- 3.2** Volunteers and trustees are not usually covered by the Act. FAM will nonetheless give them the **same protection** under this policy. Anyone who victimises, bullies or threatens a person for raising a concern will face action under the Grievance and Disciplinary Procedure or the Volunteer Policy, and trustees may be removed in line with the constitution.
- 3.3** This protection does not apply to someone who knowingly makes a false allegation. That will be treated as a serious matter. A concern raised honestly that turns out to be wrong is not a false allegation.
- 3.4** Settlement agreements and confidentiality clauses cannot stop anyone from making a protected disclosure, and FAM will not ask anyone to agree to that.

4 How to raise a concern

4.1 We hope you will feel able to raise concerns inside the charity first, so that we can put things right quickly. Use the route that feels right for you:

If your concern is about	Raise it with
General wrongdoing	Your line manager or the Operations Lead
The Operations Lead	The Chair of Trustees
Money, grants or financial controls	The Treasurer or the Chair of Trustees

If your concern is about	Raise it with
Safeguarding	The DSL, or the Safeguarding Trustee if the DSL is involved
A trustee or the Chair	Another trustee, or the Safeguarding Trustee or Treasurer as relevant

4.2 Contact details for the Chair, Treasurer and Safeguarding Trustee are kept on the Safeguarding Contacts Sheet at each site and on the shared drive.

- (a) Raise the concern in person, by phone or in writing. It helps to put it in writing, with dates, names and what you saw or heard.
- (b) Say that you are raising it under the Whistleblowing Policy.
- (c) You may bring a colleague or trade union representative to any meeting about your concern.
- (d) Keep the matter confidential and do not try to investigate it yourself.

Confidentiality and anonymity

4.3 We will keep your identity confidential if you ask us to, unless the law requires us to disclose it or it is needed to protect someone from harm. If that happens we will talk to you first where we can. You can raise a concern anonymously, but it is harder for us to investigate and to give you feedback.

5 What happens next

- (a) The person receiving the concern tells the Chair of Trustees (or another trustee if the Chair is involved) and records it in the confidential whistleblowing log.
- (b) We acknowledge your concern within 5 working days and, where appropriate, meet you to understand it.
- (c) The Chair of Trustees decides who will investigate. It will be someone independent of the matter. For serious or complex concerns, trustees may appoint an external investigator.
- (d) We aim to complete the investigation within 30 working days. If it will take longer, we will tell you.
- (e) We will tell you the outcome as far as we can. We may not be able to share full details, for example to protect other people's confidentiality.
- (f) Trustees decide what action to take, which may include disciplinary action, changes to controls, reporting to the police, or reporting a serious incident to the Charity Commission under the Serious Incident Reporting Policy.

5.1 If you are not happy with how your concern has been handled, raise it with the Chair of Trustees or the full board.

6 Raising concerns outside the charity

6.1 You can go to an outside body if you do not feel able to raise the concern internally, or if you have done so and nothing has happened. The law protects disclosures to

prescribed persons, the official bodies listed by the government for different kinds of concerns. Those most relevant to FAM include:

Type of concern	Prescribed person or body
The proper administration of the charity, its funds and assets	Charity Commission
Health and safety risks	Health and Safety Executive (HSE) or the local authority
Data protection and information rights	Information Commissioner's Office (ICO)
Tax, Gift Aid, payroll and National Minimum Wage	HM Revenue and Customs
Serious or organised crime	National Crime Agency

- 6.2** The full, current list of prescribed persons is published on the GOV.UK website. You can also report crimes to the **police** or **Report Fraud (formerly Action Fraud)**, and child protection concerns to the local authority or LADO at any time.
- 6.3** Going to the media or social media is only protected in limited circumstances and may harm the people we support. Please take advice first. The Advisory, Conciliation and Arbitration Service (ACAS) can give free, confidential advice, and you can also speak to a trade union or a solicitor.

7 Responsibilities

Role	Responsibility
Trustees	Approve this policy, make sure concerns are investigated fairly and receive a summary of concerns raised.
Chair of Trustees	Owns this policy, oversees investigations and makes sure whistleblowers are protected.
Operations Lead	Makes sure staff and volunteers know about this policy and receive it at induction.
Managers	Take concerns seriously, pass them on promptly and protect confidentiality.
Everyone	Speak up about wrongdoing and never victimise someone who does.

8 How this policy supports our focus

- Anyone who works or volunteers with FAM can raise a concern, especially where young people's safety or the charity's funding may be at risk.

9 Related policies

- Safeguarding Children and Young People Policy

- Safeguarding Adults at Risk Policy
- Code of Conduct and Professional Boundaries (Staff and Volunteers)
- Anti-Fraud, Bribery and Money Laundering Policy
- Conflicts of Interest and Related Parties Policy
- Serious Incident Reporting Policy
- Grievance and Disciplinary Procedure
- Volunteer Policy
- Complaints Policy
- Trustee Code of Conduct and Board Responsibilities

Approval record

Approved by the Board of Trustees on	10 th Sep 2026
Signed (Chair of Trustees)	
Next review due	31st July 2027
Version history	1.0, September 2026. New policy; replaces any earlier FAM or FACE version.