Whistleblowing Policy

Date: May 2025
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1. Purpose and Scope

Zest of Mind is committed to maintaining the highest standards of openness, probity, and accountability. This policy establishes clear procedures for staff and volunteers to raise concerns about potential wrongdoing, misconduct, or practices that may compromise the safety and wellbeing of children, young people, vulnerable adults, or the integrity of our organisation.

All staff (paid and unpaid), volunteers, trustees, and third-party personnel are covered by this policy and have a duty to report concerns through the appropriate channels when they become aware of activities which they believe are illegal, improper, unethical, or otherwise inconsistent with our Code of Conduct or organisational standards.

2. What Constitutes a Whistleblowing Concern

Whistleblowing concerns include situations where staff become aware of activities which they believe are illegal, improper, unethical, or otherwise inconsistent with our Code of Conduct or organisational standards. This includes, but is not limited to:

Safeguarding-Related Concerns

Situations where a member of staff, visiting professional, third-party staff member, volunteer, or trustee has:

- Behaved in a way that has harmed or may have harmed a child, young person, or vulnerable adult
- Possibly committed a criminal offence against or related to a child, young person, or vulnerable adult
- Behaved or may have behaved in a way that indicates they are unsuitable to work with children, young people, or vulnerable adults

General Misconduct Concerns

- Breaches of our Code of Conduct or organisational policies
- Fraud, corruption, or financial misconduct
- Health and safety violations that could endanger service users or staff

- Criminal activity or illegal behaviour
- Unethical practices or professional misconduct
- Attempts to cover up any of the above concerns

3. Reporting Procedure

The procedure for reporting concerns varies depending on the nature of the concern:

For Safeguarding-Related Concerns

When concerns relate to the safety of children, young people, or vulnerable adults, follow this procedure:

Step 1: Initial Reporting All concerns must be reported immediately to the **Designated Safeguarding Lead (DSL)**. A written record of the concern must be completed using the appropriate reporting form.

Step 2: DSL Availability Assessment

- **If the DSL is available:** The DSL will review the concern and take appropriate action
- **If the DSL is not available:** The concern should be escalated immediately to the **Deputy Designated Safeguarding Officer**
- **If the concern relates to the DSL:** Report directly to the **Safeguarding Trustee Lead**

Step 3: External Consultation The DSL (or appropriate alternative) will contact the **Local Authority Safeguarding Partnerships** for advice, including the Local Authority Designated Officer (LADO) when concerns relate to children.

Step 4: Following External Advice All advice provided by external agencies must be followed promptly and completely.

For General Misconduct or Other Concerns

For concerns that are illegal, improper, unethical, or inconsistent with our Code of Conduct but do not relate to safeguarding, follow this procedure:

1. **First raise the concern with your line manager**, unless they are the subject of the concern
2. **If you cannot raise it with your line manager**, or if you are not satisfied with their response, raise the concern with the **Director**
3. **If the concern involves the Director**, raise the issue with the **Secretary of Trustees**
4. **If you feel the matter is so serious** that you cannot discuss it with any of the above, contact the relevant regulatory body

4. Low-Level Concerns

Concerns that do not meet the harm threshold should be treated as low-level concerns. These may arise through:

- Suspicion or observation of inappropriate behaviour
- Complaints from service users, parents, or colleagues

- Disclosures made by children, young people, vulnerable adults, or their families
- Issues identified through vetting or supervision processes

Low-level concerns should still be reported through the same channels and will be addressed proportionately while maintaining appropriate records.

5. Protection and Support

Zest of Mind recognises that whistleblowing can be difficult and stressful. We are committed to ensuring that:

For Those Raising Concerns:

- Staff who raise legitimate concerns will not be penalised
- Confidentiality will be respected throughout the process
- Staff will be protected from retaliation or adverse consequences as a result of reporting genuine concerns
- Staff will be protected from victimisation or harassment
- Anonymous reporting is accepted, though this may limit our ability to investigate thoroughly
- Support will be provided throughout the process, including access to counselling if needed

For Those Subject to Allegations:

- Individuals will be treated fairly and with dignity throughout any investigation
- Support will be provided, including access to employee assistance programmes
- Clear communication about the process and their rights will be maintained
- Appropriate adjustments to duties may be made pending investigation outcomes

6. Confidentiality and Information Sharing

- Information will only be shared on a need-to-know basis
- Confidentiality will be maintained throughout the process, except where disclosure is required for safeguarding or legal purposes
- All documentation will be stored securely and in accordance with data protection requirements
- Records will be retained in line with our retention policy and regulatory requirements

7. Investigation Process

All reports will be thoroughly investigated and appropriate action taken. The investigation process will include:

- Thorough investigation by appropriately trained individuals
- External investigators may be appointed for serious allegations
- Investigations will be conducted promptly while ensuring thoroughness
- Regular updates will be provided to all parties as appropriate
- Clear timescales will be established and communicated
- Outcomes will be communicated to relevant parties in accordance with confidentiality requirements

8. Learning and Improvement

Following any whistleblowing case, whether substantiated or not:

- A lessons learned review will be conducted
- Recommendations for improvement will be identified and implemented
- Policies and procedures will be updated as necessary
- Staff training needs will be assessed and addressed
- Organisational culture and practices will be reviewed

9. External Reporting

If internal procedures do not address concerns adequately, or if there are concerns about the organisation's handling of the matter, staff may report to:

- Charity Commission (for governance and trustee concerns)
- Care Quality Commission or relevant regulators
- Local Authority safeguarding partnerships
- Police (for criminal matters)
- Relevant professional bodies
- Public Concern at Work (independent whistleblowing charity)

10. False or Malicious Allegations

While we encourage the reporting of genuine concerns, knowingly making false or malicious allegations may result in disciplinary action. However, this will not apply to concerns raised in good faith that are subsequently found to be unsubstantiated.

11. Training and Awareness

- All staff and volunteers will receive training on this policy during induction
- Regular refresher training will be provided
- The policy will be readily accessible to all staff
- Managers will receive additional training on handling whistleblowing concerns

12. Policy Review

This policy will be reviewed annually and updated as necessary to reflect:

- Changes in legislation or guidance
- Lessons learned from cases
- Best practice developments
- Organisational changes

13. Key Contacts

For Safeguarding-Related Concerns:

Designated Safeguarding Lead:

Alastair Coward

- Telephone: 07956 478 393
- Email: alastair@zestofmind.com

Deputy Designated Safeguarding Officer:

Dilusha Dimunge
- Telephone: 07391 612 537
- Email: safeguarding@zestofmind.com

Safeguarding Trustee Lead:

Dilusha Dimunge
- Telephone: 07391 612 537
- Email: admin@zestofmind.com

Local Authority Designated Officer (LADO):

Brent Local Authority Designated Officer (LADO):

- Brent Family Front Door
- Office hours Monday – Friday 9am - 5pm: Call 020 8937 4300
  Outside office hours: Call emergency duty team 020 8863 5250
- Email: familyfrontdoor@brent.gov.uk

Harrow Local Authority Designated Officer (LADO):

- Rosalind South
- Office hours Monday – Friday 9am – 5pm: Call 020 8901 2690
  Outside office hours: Call 020 8424 0999
- Email: lado@harrow.gov.uk

Local Authority Adult Safeguarding:

Brent Safeguarding Adults Board (BSAB)

- Call: 020 8937 4098 or 020 8937 4099
- Email: Brent.Safeguardingpartnerships@brent.gov.uk

Harrow Safeguarding Adults Board (HSAB)

- Call: 020 8901 2680
- Email: AHadults@harrow.gov.uk

For General Misconduct or Other Concerns:

Your Line Manager: [As designated by role]

Director:
Alastair Coward
- Telephone: 07956 478 393
- Email: alastair@zestofmind.com

Secretary of Trustees: [Name and contact details]

External Regulatory Bodies:

- Other relevant regulatory bodies as appropriate