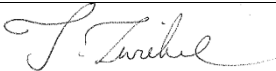


# *Sunbeams*

## **WHISTLEBLOWING POLICY**

## Document Control Sheet

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Approved By	Jessica Zwiebel, Safeguarding Officer and Trustee
Signature	

## Revision History

Version	Date	Author	Description of Change	Approved By
1.0	Sep 2017	Admin	Initial release outlining whistleblowing process and protections.	Board of Trustees
2.0	Sep 2018	Admin	Review	Board of Trustees
3.0	Sep 2019	Admin	Review	Board of Trustees
4.0	Sep 2020	Admin	Minor update to confidentiality wording.	Board of Trustees
5.0	Sep 2021	Admin	Review	Board of Trustees
6.0	Sep 2022	Admin	Review	Board of Trustees
7.0	Sep 2023	Admin	Small clarification on anonymous reporting options.	Board of Trustees
8.0	Jan 2024	Admin	Review	Board of Trustees
9.0	Apr 2024	Admin	Review	Board of Trustees
10.0	Jul 2025	Admin	Review	Board of Trustees
11.0	Sep 2025	Admin	Comprehensive review; strengthened reporting routes and updated contacts.	Board of Trustees

## **1. introduction**

Sunbeams are committed to operating in an open, honest, and accountable way. This policy provides a mechanism for staff, volunteers, and others connected with the organisation to raise genuine concerns about wrongdoing or risk without fear of victimisation or reprisal. It applies to all individuals working with or on behalf of Sunbeams, including employees, sessional workers, mentors, volunteers, trustees, contractors, and partner agencies. This policy should be used when there is a concern that the public interest is at risk, such as suspected criminal activity, abuse, or serious misconduct. It is distinct from the Complaints Policy, which deals with personal grievances or service dissatisfaction.

## **2. Legal and Regulatory Framework**

This policy complies with:

- Public Interest Disclosure Act 1998 (PIDA)
- Charities Act 2011
- Charity Commission Guidance CC30 – Safeguarding and protecting people for charities and trustees (2023)
- Working Together to Safeguard Children (2023)
- Data Protection Act 2018 and UK GDPR
- Employment Rights Act 1996

The policy aligns with Sunbeams' overarching duty of care to safeguard beneficiaries, uphold integrity, and maintain trust in charitable operations.

## **3. Policy Statement**

Sunbeams encourage a culture where concerns can be raised freely and investigated fairly. We believe that everyone has a responsibility to speak up about wrongdoing or malpractice.

Sunbeams will ensure that:

- All whistleblowing concerns are taken seriously and investigated appropriately.
- Individuals are protected from victimisation or discrimination for raising genuine concerns.
- Confidentiality is maintained as far as possible.
- Findings are addressed, and corrective action is taken where necessary.
- Learning from whistleblowing cases informs improved practice and governance.

## **4. Principles**

- **Good faith:** Concerns must be raised honestly and with reasonable belief in the facts presented.
- **Fairness:** Investigations will be handled impartially and confidentially.
- **Protection:** No one will be penalised for raising a concern in line with this policy.
- **Transparency:** Outcomes (where appropriate) will be shared with the whistleblower.
- **Accountability:** All cases are recorded and reviewed by the Director and Trustees.

## **5. What Can Be Reported**

Whistleblowing covers any disclosure of information that an individual reasonably believes shows one or more of the following:

- Criminal activity or breach of the law.
- Breach of Sunbeams' safeguarding duties.
- Miscarriage of justice.

- Health and safety risks.
- Neglect, abuse, or exploitation of a child, volunteer, or staff member.
- Financial irregularity, theft, or misuse of funds.
- Failure to comply with legal or regulatory obligations.
- Deliberate concealment of wrongdoing.

This policy is not intended for personal grievances relating to employment conditions, which should be handled under the Grievance Policy.

## **6. How to Raise a Concern (Internal Procedure)**

### **6.1 Step 1 – Raise with Line Manager**

Where possible, concerns should first be raised with your immediate Line Manager. This allows issues to be resolved quickly and informally.

### **6.2 Step 2 – Escalate to Director**

If the concern involves your Line Manager or you feel unable to discuss it with them, the concern should be raised directly with the Director (Ruchi Ostreicher).

You can do this in writing or verbally. Include as much detail as possible (dates, locations, individuals involved, evidence available).

### **6.3 Step 3 – Escalate to Trustee Lead**

If the concern involves the Director, or if you believe your concern has not been handled appropriately, you may contact the Trustee Lead (Jessica Zwiebel) via

[trustees@sunbeamslondon.org.uk](mailto:trustees@sunbeamslondon.org.uk).

### **6.4 Step 4 – External Reporting**

If internal reporting is not appropriate or fails to resolve the issue, you may report directly to external bodies (see section 7 below).

## **7. External Reporting Options**

If you believe your concern has not been properly addressed internally, or if it involves serious misconduct such as safeguarding failure or criminal activity, you may contact:

- The Charity Commission – [whistleblowing@charitycommission.gov.uk](mailto:whistleblowing@charitycommission.gov.uk) | 0300 066 9197
- The NSPCC Whistleblowing Advice Line – 0800 028 0285 | [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- The Local Authority Designated Officer (LADO) for Hackney or Haringey – contact via local council safeguarding team
- The Police – for suspected criminal offences
- HMRC – for suspected financial or tax fraud

Individuals have legal protection under the Public Interest Disclosure Act when reporting to prescribed external bodies.

## **8. Safeguards and Protections**

### **8.1 Confidentiality**

All concerns will be treated with the highest level of confidentiality. Information will only be shared where necessary to conduct a fair investigation or to meet safeguarding or legal obligations.

### **8.2 Protection from Victimisation**

Sunbeams will not tolerate any form of retaliation or detriment against someone who raises a genuine concern. Disciplinary action will be taken against anyone who victimises or attempts to intimidate a whistleblower.

### **8.3 Anonymous Reporting**

Anonymous reports will be accepted and considered, though the ability to investigate may be limited. Sufficient information must be provided to enable meaningful inquiry.

#### 8.4 False Allegations

Malicious or knowingly false allegations will be treated as a disciplinary matter, but no action will be taken against individuals who raise concerns in good faith, even if they are later found to be unfounded.

### 9. Investigation Procedure

- The Director (or Trustee Lead if applicable) will acknowledge the concern within 10 working days.
- A preliminary review will determine whether a formal investigation is warranted.
- If an investigation proceeds, an independent investigator or panel will be appointed.
- The whistleblower will be informed of the progress and likely timeframe (normally within 45 days).
- A written record of findings and actions will be kept.
- Appropriate action will be taken to address any substantiated concern.

If the matter reveals criminal conduct or safeguarding risk, external authorities (e.g. police, local authority, Charity Commission) will be notified immediately.

### 10. Record Keeping and Confidentiality

- All whistleblowing records will be maintained securely by the Director in accordance with the Data Protection Act 2018 and UK GDPR.
- Records will include details of the concern, investigation steps, outcomes, and any lessons learned.
- Records will be retained for a minimum of seven years and reviewed annually for learning and improvement.

### 11. Monitoring and Review

- The Director and Trustee Lead will review whistleblowing reports annually to identify patterns, risks, or systemic issues.
- Lessons learned will be used to strengthen Sunbeams' safeguarding, HR, and governance frameworks.
- Trustees will receive an anonymised summary report as part of the annual safeguarding and compliance review.
- This policy will be reviewed every 12 months or sooner if there are significant legal or organisational changes.

### 12. Communication and Awareness

- All staff, volunteers, and mentors will be informed of this policy during induction and annual safeguarding refreshers.
- A summary and reporting flowchart will be displayed on staff noticeboards and in the staff handbook.
- Managers and supervisors will ensure their teams understand how to raise concerns safely and confidentially.

Signed: \_\_\_\_\_ Position: Trustee

Date: \_\_\_\_\_