

Whistleblowing Policy

Capa First Response CIC

Created: March 2025

Date: May 2026

Review Date: May 2027

1. Purpose

Capa First Response CIC is committed to conducting its activities with honesty, integrity, transparency and accountability.

We encourage staff, volunteers, associates, contractors and others connected to the organisation to raise genuine concerns where they believe wrongdoing, malpractice, unethical behaviour or risks to people may be occurring.

This policy provides a safe process for reporting concerns and aims to ensure that individuals can speak up without fear of victimisation, retaliation or disadvantage.

Capa recognises that raising concerns is an important part of safeguarding children, adults, staff, volunteers and the wider organisation.

2. Scope

This policy applies to:

- Employees
- Sessional workers
- Associate practitioners
- Volunteers
- Students and placements
- Contractors and consultants
- Directors
- Anyone acting on behalf of Capa

This policy applies to concerns relating to:

- Safeguarding failures
- Abuse or neglect of children or adults

- Fraud or financial misconduct
- Bribery or corruption
- Criminal activity
- Breaches of legal obligations
- Breaches of Charity Commission requirements
- Health and safety concerns
- Serious breaches of organisational policies
- Data protection breaches
- Discrimination, harassment or victimisation
- Unethical conduct
- Deliberate concealment of wrongdoing
- Risks to service users, staff or the organisation

3. What Is Whistleblowing?

Whistleblowing is the reporting of concerns about wrongdoing that is believed to be in the public interest.

Whistleblowing is different from a personal employment grievance.

Examples of whistleblowing concerns include:

- Concerns about the safety of children or adults.
- Misuse of organisational funds.
- Falsification of records.
- Deliberate breaches of safeguarding procedures.
- Covering up poor practice.
- Serious breaches of confidentiality.
- Criminal conduct.
- Serious health and safety failures.

Personal concerns about employment matters should normally be raised through the Grievance Procedure.

4. Our Commitment

Capa is committed to:



- Taking concerns seriously.
- Investigating concerns fairly and proportionately.
- Protecting individuals who raise concerns in good faith.
- Maintaining confidentiality wherever possible.
- Ensuring no individual suffers detriment for raising genuine concerns.
- Learning from concerns raised.

We recognise that speaking up can feel difficult and we aim to create a culture where concerns are welcomed and addressed constructively.

5. How to Raise a Concern

Concerns should be raised as soon as possible.

Where possible, concerns should include:

- What happened.
- Who was involved.
- When and where it occurred.
- Any evidence available.
- Why you are concerned.

Concerns may be raised verbally or in writing.

First Point of Contact

Concerns should normally be reported to:

Chief Executive Officer / Designated Safeguarding Lead

Jane Griffiths

jane@capafirstresponse.org

If the Concern Involves the CEO

If the concern relates to the Chief Executive Officer, concerns should be reported directly to:

Chair of Directors



The Chair will determine the appropriate investigation process.

Safeguarding Concerns

Any safeguarding concerns involving a child, adult at risk or member of staff should also be reported in line with Capa's Safeguarding Policy and may require immediate action.

Safeguarding concerns will always take priority where there is a risk of harm.

6. Confidentiality

Capa will make every effort to protect the identity of anyone raising a concern. Information will only be shared where necessary:

- to investigate the concern
- to safeguard individuals
- where required by law
- where external agencies need to be involved

Absolute confidentiality cannot always be guaranteed, but concerns will be handled sensitively and appropriately.

7. Anonymous Concerns

Concerns may be raised anonymously.

However, individuals are encouraged to provide contact details where possible, as this may assist any investigation and allow clarification of information.

Anonymous concerns will still be considered and investigated where appropriate.

8. Protection from Retaliation

No individual will suffer harassment, victimisation, disadvantage or retaliation for raising a concern in good faith.

Retaliation against a whistleblower is a serious disciplinary matter and may be treated as gross misconduct.

Any individual who believes they have suffered retaliation should report this immediately.

9. Investigation Process

Concerns will normally be:

1. Acknowledged promptly.
2. Assessed to determine the level of risk.
3. Investigated by an appropriate person.
4. Escalated to external agencies where necessary.
5. Recorded securely.

Depending on the nature of the concern, investigations may involve:

- The CEO
- Chair of Directors
- Safeguarding Leads
- Independent advisors
- External professionals
- Statutory agencies

Where possible, feedback will be provided regarding the outcome of the investigation.

However, confidentiality obligations may limit the information that can be shared.

10. Malicious or False Allegations

Capa encourages individuals to raise concerns honestly and in good faith.

Any person who knowingly makes a false or malicious allegation may be subject to disciplinary action.

A concern raised in good faith will not result in disciplinary action simply because it is not upheld following investigation.

11. Record Keeping

A confidential record of whistleblowing concerns will be maintained.

Records will include:

- Date concern received.
- Nature of concern.

- Action taken.
- Outcome.
- Learning identified.

Records will be stored securely and managed in accordance with data protection legislation.

12. Monitoring and Learning

The Board of Directors will receive appropriate oversight information regarding whistleblowing concerns while maintaining confidentiality.

Themes, trends and learning will be reviewed regularly to:

- strengthen governance
- improve safeguarding
- improve organisational culture
- identify policy or training needs
- reduce future risk

13. Related Policies

This policy should be read alongside:

- Safeguarding Policy
- Complaints Policy
- Grievance Policy
- Disciplinary Policy
- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Anti-Bribery and Corruption Policy

14. Approval and Review

This policy has been approved by the Board of Directors of Capa First Response CIC.

The policy will be reviewed annually or sooner if legislation, guidance or



organisational practice changes.

END.