Whistleblowing policy

In this policy 'Whistleblowing' means the confidential reporting by employees of suspected misconduct, illegal acts or failure to act within the company. The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of our work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within the Organisation. 'Whistleblowing' is viewed by Connect IoW CIO as a positive act that can make a valuable contribution to our efficiency and long-term success. It is not disloyal to colleagues or the Organisation to speak up. Connect IoW CIO is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices. To help achieve these standards it encourages freedom of speech.

If you are considering raising a concern you should read this Policy first. It explains:

- the type of issues that can be raised
- how the person raising a concern will be protected from victimisation and harassment
- how to raise a concern, and
- what we will do.

Aims

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the company without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is also intended to encourage and enable you to raise serious concerns within the company rather than ignoring a problem or 'blowing the whistle' outside.
This Policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

This Policy is intended to enable those who become aware of wrongdoing in the company affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated

The Whistle Blowing Policy is not intended to replace existing procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing Grievance procedures
- If a Service User has a concern about services provided to him/her, it should be raised as a complaint to the CIO

The Policy applies to all employees and volunteers of Connect IoW CIO

Any serious concerns that you have about service provision or the conduct of employees or others acting on behalf of the company that:

- makes you feel uncomfortable in terms of known standards;
- are not in keeping with the company vision and policies;
- fall below established standards of practice; or
- are improper behaviour

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
- disclosures related to miscarriages of justice
- racial, sexual, disability or other discrimination

- health and safety of the public and/or other employees
- damage to the environment
- unauthorised use of public funds or other assets
- possible fraud and corruption
- neglect or abuse of clients, or
- other unethical conduct

This list is not exhaustive.

Protecting the Whistleblower

This policy has been written to take account of the Public Interest Disclosure Act 1998 which protects workers making disclosures about certain matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest. The Act makes it unlawful for a company to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act. Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. Connect IoW CIO cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

Connect IoW CIO is committed to good practice and high standards and to being supportive of you as an employee. We recognise that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service. We will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

Throughout this process:

- you will be given full support from the Leadership Team
- your concerns will be taken seriously, and
- Connect IoW CIO will do all it can to help you throughout the investigation

If appropriate, we will consider temporarily re-deploying you for the period of the investigation.

For those who are not employees, we will endeavour to provide appropriate advice and support wherever possible.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

Anonymous Allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful but they may be considered at the discretion of the company. In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

Untrue Allegations
If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the company will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action (which could include Disciplinary action) may be taken.

Raising a Concern
This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns with the Chief Executive Officer CEO (Jennifer Barker) or the Chief Compliance Officer CCO (Kathryne Mason)

You may raise your concern by telephone, in person or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates)

This should be sent in writing to concerns.connectiow@gmail.com or directly to the Chief Executive Officer if you feel this is more appropriate jenny@connectiow.com. Alternatively, you can submit anonymously using the postbox in the office using the paper forms kept with all staff forms.

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you have a genuine concern relating to suspected wrongdoing or malpractice and there are reasonable grounds for your concern

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns. You may invite a representative or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised

What we will do
The Chief Compliance Officer will respond to your concerns as quickly as possible. Do not forget that testing your concerns is not the same as either accepting or rejecting them. The overriding principle will be the public interest. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the police
- be referred to an external auditor
- be referred and put through established child protection/abuse procedures
- form the subject of an independent inquiry

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received
- indicating how we propose to deal with the matter
- supplying you with information on staff support mechanisms
- telling you whether further investigations will take place and if not, why not.

The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood. Any meeting can be arranged away from your workplace, if you wish, and a union or professional association representative or a friend may accompany you in support. We will do what we can to minimise any difficulties that

you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, we will arrange for you to receive appropriate advice and support. You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

How the Matter can be Taken Further

This Policy is intended to provide you with an avenue within the Organisation to raise concerns. We hope you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter outside the company, the following are the company's prescribed contacts:

- Isle of Wight Council
- your trade union
- the police

If you raise concerns outside of the Organisation you should ensure that it is to one of these prescribed contacts. A public disclosure to anyone else could take you outside the protection of the Public Interest Disclosure Act and of this Policy. You should not disclose information that is confidential to the Organisation to anyone else

This Policy does not prevent you from taking your own legal advice.

Recording and Monitoring

The Chief Compliance Officer will maintain a register containing all concerns that are brought to their attention. We will review the register and produce an annual report to submit to the Trustees. The report will include a summary of the concerns raised, to which department they related, the post to which the concerns related (if not confidential) and any lessons learned. The report will not include any employee names. The aim of this is to ensure that we learn from mistakes and do not repeat them. The register together with the annual reports will be available for inspection by internal and external audit, after removing any confidential details

Policy last review date: 12.06.2026