



Raising Concerns and Whistleblowing Policy

September 2023

1. POLICY STATEMENT

All United Response employees, agency workers and contractors have a duty to raise concerns relating to the quality of support or the culture of the workplace. All managers and Directors will take concerns raised seriously and act in line with this policy and associated guidance. United Response Directors will support people raising concern and managers receiving concerns to foster an open culture.

2. PEOPLE AFFECTED BY THIS POLICY

All employees and those who otherwise carry out work for or on behalf of United Response, including agency workers, consultants and volunteers.
Trustees will receive an annual report about any whistleblowing that has occurred within the organisation.

3. CQC COMPLIANCE

This Policy supports compliance with the following Key Questions. The Service is:

SAFE	EFFECTIVE	CARING	RESPONSIVE	WELL-LED
✓	✓	✓	✓	✓

CIW COMPLIANCE

This Policy supports compliance with the following Key Themes:

WELLBEING	CARE AND SUPPORT	ENVIRONMENT	LEADERSHIP AND MANAGEMENT
✓	✓		✓

4. PROCEDURE (that all staff MUST follow)

The following is a link to the [What is Whistleblowing](#) flowchart found in the guidance document.

4.1 Principles

Every worker is responsible for ensuring that abuse and bad practice does not happen in United Response, this includes support and the environment and culture of teams relating to people we support and employees. All workers have a duty to report concerns and whistleblowing in good faith. All Managers and Directors have a duty to listen and act on what they hear and take all concerns raised



seriously. United Response Managers and Directors have a duty to support people who raise concerns in good faith and protect staff who 'blow the whistle'.

In good faith means that the person raising the concern has good reason to believe this is a concern and is raising the concern to ensure that support and team culture are improved and not with any malicious intent.

Concerns or complaints should not be made maliciously or vexatiously. To be considered vexatious, the disclosure is made without reasonable grounds of belief and with the primary intent of causing harm to the subject or any other third party.

(see [Raising concerns and Whistleblowing guidance](#) for more information about good faith)

Concerns which are raised under any policy will be taken forward as 'whistleblowing' if the concern is judged to be a concern raised which is made in the public interest and relate to the list below.

- A criminal offence or activity which has been, or is likely to be, committed. This could include neglect, abuse, theft, fraud, breach of data protection etc.
- The breach of a legal obligation.
- A potential, or actual, danger to the health and safety of any individual. This can include medical negligence, dangerous working environments etc.
- Activities which present a serious risk to the environment
- A miscarriage of justice.
- A deliberate attempt to conceal any of the above.

The individual, or individuals, who have blown the whistle will be protected and supported in line with the Public Interest Disclosure Act 1998 (the Act). The Act provides additional protection from detrimental treatment or victimisation from their employer if, in the public interest, they report concerns about serious wrongdoing, provided that the concerns they report meet the conditions in the Act for a 'protected disclosure'.

4.2 Raising Concerns/Whistleblowing/Grievance /Complaints in context

Concerns may be raised through a number of routes discussed below.

To ensure the most effective method of raising a concern and to ensure the best legal protection possible, we would encourage the use of the channels depicted within this policy.

We also acknowledge that, from time to time, concerns are raised via the press or social media. However, in order to be afforded the same legal protection, the whistle blower would need to fulfil a further test of reasonableness under the Public Interests and Disclosure Act when compared to situations where they have raised concerns with either their employer or a regulatory body.

If anyone is unsure of the correct route, please contact Human Resources at



HRsupport@unitedresponse.org.uk or a member of the Quality Team via Michael.brent@unitedresponse.org.uk for advice. Employees can raise concerns as below and the person receiving concerns can also advise which policy should be followed.

In general, the following applies.

Raising Concerns and Whistleblowing Policy – For concerns about the support and team culture which affect people we support and /or groups of staff.

Grievance Policy – For concerns relating to the way employees have been treated whilst at work. The concern is raised by the person/people affected and usually affects only one or two people.

Complaints and concerns Policy – for concerns raised by people we support, their family, friends or people from external agencies and the general public.

4.3 Raising a Concern or whistleblowing

If you raise a concern or blow the whistle

United Response want you to:

- Feel confident about raising concerns and to question and act on these concerns
- Know you will receive appropriate feedback on any action taken
- Know we will confirm that all concerns raised will be examined and United Response will assess what action should be taken
- Be assured that you will be protected from possible reprisals or victimisation if you have made a disclosure in good faith
- Be assured we will provide ways for you to take the matter further if you are dissatisfied with our response

Manager's receiving a concern / whistleblowing

- Will listen carefully to what you have to say and record details
- Will not take action without consulting with a Senior Manager and/or HR as appropriate
- Will arrange a time to feedback to you about what action will be taken
- Will provide you with details of the policies and procedures relevant to your concern
- Will provide you with information about services and people that can support you with any worries you have following raising the concern

Who to contact



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In the first instance and where appropriate, concerns should be raised informally with the individuals involved. For example, giving feedback to a colleague where poor practice is witnessed, this may help change the practice immediately. You should also inform your manager of the concern that you had and the discussion you had with your colleague to enable managers to ensure the concern has been rectified.

You may feel more confident to raise the concern directly with your line manager or someone else. There are many people within United Response you can contact to raise your concern.

Please make sure the person you are raising the concern with knows that you are raising it as a concern under this policy.

You can contact

Your Line manager, in discussion, over the phone or in writing

Your line managers' manager or any director if the concern relates to your manager.

The CEO of United Response by contacting 0208 016 5673

Confidential email address Email RaisingConcernsatWork@unitedresponse.org.uk. This email inbox will be monitored by the Quality and Safeguarding team.

Charity employees can report concerns about certain categories of serious wrongdoing at their charity concerning the CEO or Board of Trustees. In the first instance reports should be made by contacting one of the following people by email:

Head of Human Resources Jennifer.Tremewan@unitedresponse.org.uk

Head of Quality and Safeguarding – michael.brent@unitedresponse.org.uk

External contact (previous trustee) - sue.jagelman@talk21.com

Workers who are not employees may not have a United Response line manager. These individuals should initially raise concerns to an appropriate contact they have within United Response.

Information to provide

Whoever you contact to raise a concern or disclosure you should give as much detail as possible to enable the Managers and Directors take appropriate action. You will be asked to provide contact details and information about the concern which is likely to include:

- Describe the concern / reason for disclosure
- What time/ date (or period of time) did the incident/concern occur?
- Who was present at the time, were there any other witnesses?
- What happened before and after the incident occurred?
- Is this the first time you have witnessed this?
- Have you raised this concern to anyone internally or externally before?

We accept disclosures anonymously but we will need the detail above to begin to consider appropriate action and it is worth noting that it is much more difficult to resolve an issue as we may need more information from the person raising the concern / disclosure.

Where possible, the person who raised the concern will be contacted to confirm who is carrying out the investigation and will be kept informed of progress if the confidentiality and integrity of the investigation allows.



4.4 Investigating a Concern or Whistleblowing Disclosure

Concerns raised under this policy will be considered appropriately and maybe addressed informally, investigated and / or referred to safeguarding. Any concern raised which is a whistleblowing disclosure will be formally investigated.

If an appropriate formal investigation has already taken place under another United Response policy and includes information or evidence which is relevant to the whistleblowing investigation, (e.g. grievance) the information gathered through the previous process can be used as all or part of the whistleblowing investigation. In some instances it may be appropriate to seek additional information to a pre-existing investigation to add additional depth and understanding.

In some instances it will be appropriate for the investigating manager to interview, or request additional information from the person raising the concern. In this case the person raising the concern or whistleblower is entitled to be accompanied to an investigatory interview by either a colleague or a trade union representative.

An investigation report will be completed to collate the information gathered and aid understanding.

Once an investigation is completed the investigating manager will recommend appropriate action.

Raising a concern or whistleblowing does not give the employee a right to know the outcome of any action taken, however where reasonable, appropriate feedback will be given.

Following the investigation a de-brief will take place to consider learning for United Response and services. A member of the Whistleblowing panel or someone nominated by them will ask the person who raised a concern for their feedback on the process to make further improvements and develop a more open and trusting culture.

When a report regarding the CEO or Board of Trustees has been received, the person who has received the initial email will contact the Director of Quality and Practice or another Director level position if the Director of Quality and Practice is implicated in the whistle blowing concern. The Director will arrange the convening of a panel who will assess the disclosure and take the appropriate action. Following reports to any of the nominated people within the organisation that relate to the CEO or Trustees, the Charity Commission asks that whistleblowing reports are made in writing via the dedicated whistleblowing email address: whistleblowing@charitycommission.gov.uk

4.5 Protection of Whistleblowers

In line with the legal protection afforded by The Public Interest Disclosure Act 1998 and the Employment Rights Act 1996, workers will not suffer detriment as a result of whistleblowing. Additionally, using the protection of the Public Interest Disclosure Act (1998), whistleblowers can raise a concern formally and it will be investigated without their identity being disclosed.

Action will be taken to protect workers who blow the whistle from any detriment, recriminations or victimisation as a result of blowing the whistle. Any harassment or vexatious conduct by an employee towards an individual who has blown the whistle constitutes gross misconduct and will be investigated in



line with United Response's Disciplinary Policy. In some instances United Response may also involve appropriate external agencies such as the police, CQC or HSE.

4.6 Support For Whistleblowers

An individual who makes a protected disclosure will be guaranteed a person who can support them through the process, this will be in agreement with the whistleblower. The support person will be different to the person investigating the allegations.

The support person will be an appropriate manager or HR colleague. When allocating a support person the considerations highlighted within the Whistleblowing Guidance must be referred to.

The employee will be given the name, work telephone number and working hours of the person who will support them through the process. The whistleblower can then obtain moral support from the support person. The support person cannot provide the whistleblower with formal advice.

It is recognised that different people need different levels of support, therefore the onus is on the whistleblower to maintain contact with their allocated support person.

All employees will also have access to Occupational Health, counselling sessions and the confidential employee advice line.

4.7 Escalating a Whistleblowing Disclosure

Should a worker make a disclosure and it is not appropriately addressed, the disclosure should be escalated to a more senior manager or Human Resources.

Should the disclosure remain unresolved following an investigation and the whistleblower believes that they have reason for continued serious concern, they should escalate their disclosure to a more senior individual or:

- The Director of Operations North julia.casserly@unitedresponse.org.uk
- The Director of Operations South mike.crowhurst@unitedresponse.org.uk
- Head of Human Resources Jennifer.Tremewan@unitedresponse.org.uk
- The Director of Quality and Practice sarah.battershall@unitedresponse.org.uk
- The Chief Executive on their confidential telephone line 0208 016 5073 or email tim.cooper@unitedresponse.org.uk

If the whistleblower considers that their serious concern has not been adequately addressed by United Response, they may contact one of the following external organisations:

NHS AND SOCIAL CARE WHISTLE BLOWING HELPLINE
<https://speakup.direct/>

08000 724 725



CARE QUALITY COMMISSION

<http://www.cqc.org.uk>

03000 616161

enquiries@cqc.org.uk

CARE INSPECTORATE WALES

<https://careinspectorate.wales>

0300 7900 126

ciw@gov.wales

HEALTH & SAFETY EXECUTIVE

<http://www.hse.gov.uk>

020 7556 2100

hseinformationservices@natbrit.com

PROTECT (was Public Concern at Work)

020 3117 2520

<https://protect-advice.org.uk/>

Department of Health Whistleblowing helpline

<https://speakup.direct/>

08000 724725

Charity Commission

<https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer-whistleblowing@charitycommission.gov.uk>

4.8 Failure to act

The implications of failing to act on bad practice or abuse can be significant. Therefore the failure by any employee to address concerns in line with this policy is deemed to be gross misconduct and will be investigated in line with United Response's Disciplinary policy.

4.9 Confidentiality

Disclosures made under this policy can be of a serious nature therefore all people who have involvement with the whistle-blower and/or the disclosure should maintain confidentiality and only disclose information on a need to know basis.



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4.10 Whistleblowing arrangements in United Response.

Whistleblowing Champion - The Head of Human Resources is the Whistleblowing Champion for United Response. The Whistleblowing Champion is responsible for ensuring that whistleblowing arrangements within the organisation are robust and that the policy is followed. The whistleblowing champion is also responsible for reporting all whistleblowing to the Board of Trustees on at least an annual basis. If you have any feedback on the arrangements for Whistleblowing or raising concerns please contact Jennifer.tremewan@unitedresponse.org.uk

Whistleblowing Panel - United Response will convene a whistleblowing panel to review all whistleblowing concerns raised and ensure that we have made improvements, protected the whistleblower and policies have been followed. They will make any recommendations for improvement to the Whistleblowing Champion. The panel will consist of Senior Managers from Operations, HR, one Trustee and someone external to United Response who understands the work of the organisation.

5. Contacts

If you have any queries or concerns regarding this guidance, please contact the relevant person.

SUBJECT	CONTACT	TELEPHONE
HR	HR Team	07557426917
Document Owner	Quality Team	07795453176

6. Related links

INTRANET ADDRESS FOR THIS GUIDANCE

<https://uronline.sharepoint.com/sites/HR/SharedDocuments/Forms/AllItems.aspx?id=%2Fsites%2FHR%2FSharedDocuments%2FWhistleblowing&p=true&originalPath=aHR0cHM6Ly91cm9ubGluZS5zaGFyZXByaW50LmNvbS86Zjovcy9lUi9FZ1I5QmRBbTBVRkjqR3VKWi1HdWtVWUlwLUpOa0FNZjdESHd0T0NQam5mOC1nP3J0aW1lPVBQZjQ1bWxiMlVn>

POLICIES, FORMS AND DOCUMENTS

[Raising Concerns and Whistleblowing Guidance](#)
[Complaints Policy](#)

LEGISLATION

Public Interest Disclosure Act 1998
Employment Rights Act 1996

7. Document Control

VERSION	DATE OF ISSUE	DATE OF NEXT REVIEW
2	September 2015	September 2018
3	April 2017	April 2020
4	April 2020	April 2022



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5	December 2020	December 2022
6	September 2023	September 2025