

Soar Sound Whistleblowing Policy

Contents

1	Document Information	2
2	Introduction	3
2.1	Vision.....	3
2.2	Objects	3
3	Purpose of Policy	4
4	Whistleblowing Principles	5
4.1	What Can be Reported Under This Whistleblowing Policy?	5
4.2	How to Raise a Whistleblowing Concern.....	6
4.3	Wider Disclosures	6
4.4	How Soar Sound will respond to Disclosures	7
4.5	Assurances	8
5	Monitoring and Review	9
6	References	10

1 Document Information

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Author: Rob Watson (Organisation Development Director of Soar Sound)

Soar Sound's Safeguarding Officer:

Policy Validity Statement: Policy users should ensure that they are consulting the currently valid version of the documentation. This document will be reviewed one year from its issue date.

Approval: The policy will remain valid, including during its period of review. However, the policy must be reviewed next year and afterwards at least once in every three-year period.

2 Introduction

This policy sets out how Soar Sound will fulfil its statutory duties and responsibilities effectively, both within its own organisation, and for the affiliated groups and members that help with Soar Sound's not-for-profit vision and public purpose objectives.

2.1 Vision

Soar Sound seeks to provide broadcast radio and other online and legacy media services that are not for private gain, with any surplus or assets used principally for the benefit of the community.

2.2 Objects

The objects of the Company are to carry on activities which benefit the community and in particular (without limitation) to carry out radio broadcast and media production services that will benefit communities resident in Leicester and Leicestershire, and in particular, and without limitation, with a focus on public education, wellbeing, mental health, economic development and employment.

Soar Sound supports all services, projects and activities that meet our not-for-profit objectives, as above, through offering publicity in our Soar Sound radio service and other media services.

3 Purpose of Policy

Soar Sound is committed to upholding and providing information about our volunteer members' rights in relation to making qualified and protected disclosures, i.e. whistleblowing, to help our organisation operate with honesty and integrity. We expect all Volunteer members to maintain high standards. However, we recognise that all organisations face the risk of things going wrong occasionally, and the risk of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential for preventing such situations from occurring and for addressing them when they do.

All Volunteer members should have the confidence to raise a suspected wrongdoing and should know that it will be taken seriously and investigated as appropriately. Volunteer members raising genuine concerns should be able to do so without fear of reprisals, even if the Volunteer member turns out to be mistaken. Any questions in relation to this Policy should be referred to the Chair of Soar Sound in the first instance.

4 Whistleblowing Principles

This Policy explains the law on whistleblowing and provides Volunteer members with guidance as to how to raise any malpractice or wrongdoing concerns. This Policy applies to all individuals working for Soar Sound at all levels, including directors, volunteer members, consultants, trainees, casual workers, Involved Council workers, extra volunteers. This Policy should not be used for complaints relating to Volunteer members' own personal circumstances, for example, complaints about the way they have been treated at work. In such cases, Volunteer members should use Soar Sound's Grievance Procedures. This Policy does not form part of any contract of employment, and Soar Sound may amend it at any time at its absolute discretion.

4.1 What Can be Reported Under This Whistleblowing Policy?

Whistleblowing is the disclosure of information that relates to suspected wrongdoing or dangers at work, as defined by the Public Interest Disclosure Act 1998 (the 'Act') To constitute whistleblowing, a disclosure must be a 'Qualifying Disclosure' under the Act (i.e. the Volunteer Member must reasonably believe that the disclosure is in the public interest and the disclosure must communicate that the alleged wrongdoing is happening, has happened, or will happen). Such disclosures may be disclosures about:

- i. Criminal activity.
- ii. Miscarriages of justice.
- iii. Danger to health and safety.
- iv. Damage to the environment.
- v. Failure to comply with any legal obligation.
- vi. Bribery.
- vii. Financial fraud or mismanagement.
- viii. The deliberate concealment of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. It is important to note that the ACT only covers concerns raised by (volunteer workers for a charity?) workers and employees. If you have any genuine concerns related to suspected wrongdoing or danger

affecting any of Soar Sound's activities (i.e. a whistleblowing concern), you should report it following the procedures set out in this Policy. If you are uncertain whether something is within the scope of this Policy, you should seek advice from the Chair of Directors of Soar Sound.

4.2 How to Raise a Whistleblowing Concern

- For a Qualifying Disclosure to constitute a protected Disclosure (i.e. a disclosure within the scope of this Policy and covered by the law on whistleblowing) it must be made in the correct way.
- To ensure disclosures are made correctly, it is recommended that the steps within this section of the Policy are followed.
- We hope that, in many cases, you will be able to raise any concerns with Soar Sound. Where possible, we ask that any concerns are raised with the Chair of Soar Sound.
- You may give your concerns in person or put the matter in writing.
- You may be able to agree with the Chair on a way of resolving your concern quickly and effectively.
- In some cases, the Chair may refer the matter to another director within Soar Sound or a local councillor.
- However, where the matter is more serious, or you feel that it has not addressed your concern, or you would prefer not to raise it with them for any reason, you should contact the person or department that is responsible for the area of concern. (e.g. Charity commissioners).

4.3 Wider Disclosures

- The aim of this Policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace, in most cases, you should not find it necessary to alert anyone externally, i.e. anyone outside of Soar Sound.
- The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body, for example, a regulator. It will very rarely ever be appropriate to alert the media. We strongly encourage you to seek advice (e.g. legal advice) before reporting a concern to anyone external.

- Be aware that unique rules sometimes apply to determining when a Protected Disclosure can be made to an external party. For example, disclosures can be made to an external party if a Volunteer Member reasonably believes that the disclosure is substantially true, is not acting for personal gain, and it is reasonable for them to make this disclosure in all the circumstances of the situation. You can contact Soar Sound for more information on this.

4.4 How Soar Sound will respond to Disclosures

Once you have raised a concern, it will be assessed to determine what initial action or further investigation should be taken. You will be advised:

- Who is handling the matter.
- How to contact them.
- Whether any further assistance will be needed from you (e.g. whether any further information is required).

You may be required to attend additional meetings to provide further information. You may bring a colleague or union representative to any such meetings. Your companion must respect the confidentiality of your disclosure and of any subsequent investigation.

All allegations will be investigated thoroughly. Depending on the complexity of the matter, it may take time to investigate. We will try to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you details of the investigation, its outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a Volunteer member has made false allegations maliciously or with a view to personal gain, the Volunteer member may be subject to disciplinary action.

We cannot always guarantee the outcome you seek. However, we will always deal with your concerns fairly and appropriately.

4.5 Assurances

We are committed to this Policy. All volunteer members should be able to voice concerns openly under this Policy. However, if you are concerned of reprisal as a result of raising a concern under this Policy, we can take additional measures to preserve confidentiality.

- The law on whistleblowing requires that Volunteer members do not suffer any detrimental treatment as a result of raising a whistleblowing concern (i.e. a concern under this Policy), even if the Volunteer member turns out to be mistaken in their claim.
- Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern.
- Soar Sound will always take care not to subject volunteer members to detrimental treatment when dealing with whistleblowing disclosures.
- However, if you believe that you have suffered any such treatment, you should inform Soar Sound immediately to discuss a resolution of the situation.
- If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- Volunteer leader members must not in any way threaten or retaliate against other Volunteer members who have made whistleblowing disclosures.
- If you are involved in such conduct, you may be subject to disciplinary action.

5 Monitoring and Review

Soar Sound will monitor and evaluate the information that is appropriately collected in relation to the whistleblowing duties, and will make periodic reports to the Director Board, making recommendations for improvements and changes to the Soar Sound's activities and communications.

Signed: Rob Watson

Position: Organisation Development Director

Date: 9th March 2024

Review Date: 5th April 2025

Soar Sound

6 References

This Whistleblowing Policy was created using a document from Rocket Lawyer <https://www.rock-etlawyer.com/gb/en>