



The Workstation, 15 Paternoster Row, Sheffield, S1 2BX

Confidential Reporting (Whistleblowing) Policy

1. Introduction

Hope for the Future (HFTF) is committed to working with honesty, accountability, and openness. We want everyone who works with or for us to feel confident about raising concerns in good faith.

2. Scope

Throughout this policy the terms staff members, employees, or team members are used. These terms apply equally to:

- Permanent and fixed-term employees
- Volunteers
- Trustees
- Agency staff or contractors
- Temporary workers and anyone else working on behalf of HFTF

* For simplicity, we use the word staff to refer to all of these groups.

3. Purpose of this Policy

This policy sets out how staff can raise serious concerns safely and confidentially if they believe wrongdoing, misconduct, or unlawful acts are happening at HFTF.

The aims of the policy are to:

Provide a clear and fair process for raising concerns.

Protect staff who raise concerns in good faith.

Ensure all concerns are investigated promptly and thoroughly.

Meet legal duties under the Public Interest Disclosure Act 1998 and the Equality Act 2010.

This procedure is not intended for personal issues relating to an individual's own employment. Such matters should be raised through the Grievance Policy.

The procedure applies to all, regardless of employment status, length of service, or position within HFTF. It offers a safe and effective way for staff to raise serious issues, such as:

Concerns about how HFTF is being managed.

Concerns about the behaviour or actions of another staff member.

Suspected misconduct, unlawful acts, or other forms of wrongdoing.

Sexual harassment this is a protected disclosure under the Equality Act 2010 and the Employment Rights Act."

HFTF recognises that raising concerns can be difficult, particularly where serious misconduct or unlawful activity may be involved. Staff are encouraged to speak up at

the earliest opportunity so that issues can be addressed quickly and effectively before they escalate.

To ensure concerns are managed properly, it is essential that staff follow the steps outlined in this policy.

4. Roles and Responsibilities

Staff are expected to:

- Raise concerns honestly, promptly, and in good faith
- Treat the process and information confidentially
- Co-operate fully with any investigation

Staff must not:

- Cover up wrongdoing or fail to report a genuine concern
- Victimise, intimidate, or harass others for raising concerns
- Make malicious or knowingly false allegations
- Staff are expected to act in line with HFTF's values of integrity, accountability, respect, and professionalism.

Line Managers are responsible for:

- Listening carefully and treating all concerns seriously
- Protecting confidentiality and the identity of staff wherever possible
- Referring concerns to an appropriate senior manager or the Chair of Trustees if necessary
- Providing support and guidance to staff throughout the process
- Ensuring that concerns are investigated fairly, promptly, and thoroughly

Failure to follow these responsibilities may be treated as a disciplinary matter.

5. Guiding Principles

All staff should remain alert to unlawful, unethical, or inappropriate behaviour

All concerns raised under this procedure will be handled by HFTF:

- Promptly
 - Fairly
 - As confidentially as possible (see section 8)
- a. Staff may be accompanied by a colleague or trade union representative in meetings
 - b. HftF will seek to protect staff members' identity unless required by law to reveal it and will offer appropriate support throughout the process
 - c. Anonymous reports will be respected, though anonymity may limit updates and whistleblower protections
 - d. Staff acting in good faith will not face victimisation or penalties
 - e. Instructions to conceal wrongdoing are a serious disciplinary offence
 - f. Any attempts to intimidate, bully, harass, or penalise staff for raising a concern are a serious disciplinary offence

- g. Misconduct uncovered through this procedure may be treated as a disciplinary matter and reported externally if required.

6. Raising a concern

- a. First step: Report concerns to a Line Manager in confidence. If the concern involves a Line Manager: Contact a senior manager or the Chair of Trustees
- b. Investigation: The person receiving the concern will either investigate or refer it to someone appropriate (e.g., Trustees). Staff will be informed if the concern is referred elsewhere.
- c. Updates: Staff should receive an acknowledgement within 7 days. If not, or if the concern is believed not to be addressed properly, escalation to a senior manager or Chair of Trustees is expected
- d. Outcome: staff will be informed of the investigation outcome where possible, including actions taken or reasons if no action is taken

7. Public Interest Disclosures

- a. The Public Interest Disclosure Act 1998 provides special protection for workers who make what are known as 'public interest disclosures'. This is colloquially referred to as 'whistle-blowing'.

A disclosure qualifies if:

- It is made in the public interest
 - It concerns one of the issues in 7 b (criminal offences, health and safety risks, environmental damage, breaches of legal obligations, sexual harassment etc.)
 - Definitive proof is not required; a reasonable belief that wrongdoing has occurred, is occurring, or is likely to occur is sufficient.
- b. Staff members must reasonably believe it to be so because it concerns: -
 - a criminal offence.
 - a miscarriage of justice.
 - an act creating risk to health and safety.
 - an act causing damage to the environment.
 - a breach of another legal obligation HftF may have.
 - an act of sexual harassment - *this is a protected disclosure under the Equality Act 2010 and the Employment Rights Act 2026*
 - concealment of any of the above.
 - c. If internal reporting does not resolve the concern, staff may contact an appropriate regulator, such as:
 - The Charity Commission
 - HM Revenue & Customs

- Serious Fraud Office
- [Health and Safety Executive](#)
- Environment Agency

8. Confidentiality

HFTF will make every effort to maintain the confidentiality of the whistleblower. However, it must be recognised that the investigation process may reach a stage where the identity of the whistleblower needs to be revealed to allow the matter to be fully investigated or resolved.

Confidentiality will be maintained wherever possible; however, there are specific legal and ethical circumstances where the process would demand that confidentiality be breached. These include, but are not limited to:

- **Criminal Offences:** Where the information disclosed suggests that a serious crime has been committed or is likely to be committed, HFTF may be legally obligated to report the matter to the Police or other law enforcement agencies.
- **Safeguarding Concerns:** If the disclosure relates to the safety, well-being, or protection of children or vulnerable adults, HFTF's safeguarding obligations will take precedence over confidentiality to ensure the protection of individuals at risk.
- **Legal Proceedings:** If the matter results in legal action or a tribunal, HFTF may be required by law to disclose the source of the information as part of the evidence-gathering process or under a court order.
- **Regulatory Requirements:** Where the disclosure falls under the jurisdiction of a regulatory body (such as the Health and Safety Executive), HFTF may be required to share the whistleblower's identity to facilitate a formal external investigation.
- **Disciplinary Necessity:** If the accused individual has a legal right to know their accuser in order to mount a fair defence during a formal disciplinary hearing, HFTF will discuss this with the whistleblower before any disclosure is made.

In any instance where a breach of confidentiality is deemed necessary, HFTF will notify the whistleblower in advance and provide support throughout the process.

9. Malicious or False Allegations

- a. This procedure is intended to enable staff members to identify or support genuine concerns. Staff will not face penalties for raising concerns in good faith, even if they are not upheld
- b. Knowingly making false or malicious reports is a disciplinary offence

10. Reporting to External Organisations

- a. Concerns should be raised internally first to allow proper investigation
- b. Staff must not share concerns with the media, social media or with commercial organisations. Such actions will be treated as a breach of the duty of confidentiality and classed as gross misconduct, which may lead to summary dismissal.
- c. Disclosing concerns on social media will, in almost all circumstances, fall outside the legal protections afforded to whistleblowers.
- d. External disclosure is only permitted where:
 - i. It is a legal requirement (e.g., disclosure in a court of law or to law enforcement).
 - ii. The information is already lawfully in the public domain.
 - iii. The disclosure is made to a recognised statutory or regulatory body because the employee reasonably believes the internal process is compromised or a serious risk remains unaddressed.
- e. Staff are encouraged to seek advice from HR (or from an independent legal professional) before making any external disclosure to ensure they remain protected under whistleblowing legislation.

11. Appendix: Related Policies and Guidance

This policy links to the following HFTF documents:

- [Grievance Policy](#) – for personal employment concerns Note: Reports of sexual harassment, while often personal, are now classified as protected disclosures under this confidential reporting policy to ensure full legal protection against detriment.
- [Disciplinary Policy](#) – for managing misconduct
- [Managing Underperformance Policy](#) – for performance-related issues
- [Resolving Problems at Work Guidance](#) – overview of reporting and resolution options