



## Whistleblowing Policy (*summary*)

The law provides protection for individuals who raise legitimate concerns about specified matters. This means that they have the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by an individual who has a reasonable belief that one of the following acts is being, has been, or is likely to be, committed:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment e.g. Pollution incident;
- financial irregularities;
- concerns regarding fundraising practice
- act of bribery;
- harassment of a colleague, customer or other individual
- a breach of any other legal obligation; or
- concealment of any of the above.

It is not necessary for the individual to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The individual has no responsibility for investigating the matter; Alexandra Palace has responsibility to ensure that an investigation takes place.

Our policy applies to all employees and other individuals providing services or performing work, such as agency workers and contractors and covers disclosures about matters other than a breach of an employee's own contract of employment.

Individuals should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of. It is our policy that any fraud, misconduct or wrongdoing is reported and properly dealt with and Alexandra Palace therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run.

Any matter raised will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the individual who raised the issue where requested.

- Concerns raised will be assessed and appropriate action may include an informal review, an internal inquiry or a formal investigation;
- No individual will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the individual will not be prejudiced because he/she has raised a legitimate concern;
- Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence;
- If misconduct is discovered as a result of any investigation under the whistleblowing procedure the Alexandra Palace disciplinary procedure will be used, in addition to any appropriate external measures;
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, individuals should not agree to remain silent. They should report the matter to the HR Department.
- It may not always be possible to inform individuals about the precise actions Alexandra Palace will take where this would infringe on a duty of confidence owed to another person.
- Maliciously making a false allegation is a disciplinary offence;

The procedure for raising concerns is available in the full Whistleblowing Policy, which is accessible to all staff and available to others at our discretion, on request. Concerns should initially be reported to a line manager. If the individual is concerned that his/her line manager is involved in the wrongdoing or has failed to make a proper investigation or failed to report the outcome of the investigations to the Board, they should inform a whistle blowing contact by telephone: **020 8365 4555** or by emailing [whistleblowing@alexandrapalace.com](mailto:whistleblowing@alexandrapalace.com) or by directly contacting the Head of HR or the Trustee Board Lead Member for Whistleblowing. If for any other reason the individual does not wish to approach his/her line manager, he/she should also in the first instance contact Head of HR. Any approach to the director will be treated with the strictest confidence and the individual's identity will not be disclosed without his/her prior consent.

The Charity Commission provides guidance on how to report a serious issue directly to the regulator if the individual does not wish to speak to anyone in the Charity. The Charity Commission advises seeking advice from Protect (see section 10) initially to ensure the individual is unsure about whether it is within the law to share evidence with the Charity Commission.

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

An individual should always, in the first instance, talk to a manager in the organisation about a potential wrongdoing. If the individual is not satisfied with the response, he/ she is entitled to contact a relevant external body to express their concerns. In doing this the individual should:

- have a reasonable belief that the allegation is based on correct facts
- make the disclosure to a relevant body
- have a reasonable belief it is in the public interest to make the disclosure.

A “relevant body” is likely to be a regulatory body (e.g. the Health and Safety Executive, or the Financial Services Authority).

In the first instance Alexandra Palace would want to investigate any Whistle blowing concerns. Individuals should not contact the media with allegations about the organisation, except in extraordinary circumstances where neither the organisation nor the relevant regulatory body would be appropriate.

If an individual is unsure as to whether to use this policy or wants confidential advice about raising a concern about malpractice at work, they may contact the independent charity **Protect** on **020 3117 2520** [www.pcaaw.co.uk](http://www.pcaaw.co.uk) or by email at [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk).

Alexandra Palace also provides an employee assistance programme that offers confidential support service and advice on personal issues and work related issues.

For further information on concerns around Fundraising practice:

<https://www.fundraisingregulator.org.uk/wp-content/uploads/2017/02/Consultation-responses-summary-and-code-changes-1.pdf>