

The Pavement Whistleblower Policy

Our Commitment

the Pavement is committed to the highest ethical standards and encourages team members and others who have serious concerns about any aspect of our work, to come forward and voice those concerns.

Who is covered by this policy?

the Pavement team is constituted of trustees, associates and volunteers, all of whom are covered by this policy.

The Policy

The policy provides an avenue for team members and contributors to raise concerns in confidence and to receive feedback on any action taken. It is designed to deal with concerns raised in relation to specific issues which are in the public interest.

These are:

- The unauthorised use of *the Pavement* Funds
- Possible fraud or corruption
- Sexual, emotional or physical abuse or ill treatment or exploitation of beneficiaries, team members or associates
- Health and safety risks (including risks to the public and team members or the potential for harm)
- Conduct which is an offence or breach of the law
- Disclosures related to miscarriages of justice (where *the Pavement* has acted improperly or unfairly)
- Conduct which is an offence or a breach of the law; a breach of the IMPRESS Standards Code, encourages others to breach it or any other unethical conduct which undermines the principles and spirit of the Standards Code

Safeguards

the Pavement encourages team members to raise in good faith concerns s/he may have regarding any procedure or practice within the organisation.

the Pavement will ensure that any team member who makes a disclosure will not be penalised or suffer any adverse treatment for doing so.

the Pavement team members should act in good faith and not make an allegation without having reasonable grounds for believing it to be true or for purposes of personal gain.

Confidentiality

All concerns will be treated in confidence and every effort made not to reveal the identity of the whistleblower, unless s/he consents to make it known.

What is covered by this policy?

This policy outlines how to raise issues of concern which fall outside the scope of other policies and procedures, and how team members are protected against any ramifications of raising issues. It applies to those which fall outside the scope of *the Pavement's* other policies and procedures.

The Procedure

If you have a concern about malpractice, it is hoped that you will be able to raise it first with the Editor. This will obviously depend upon the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

If you believe that any other team member is involved or you feel for whatever reason unable to raise it with the Editor, you should raise the issue with the Chair of Trustees. If your concern involves a trustee then you should go to the Editor.

You should put your name on the complaint. Your identity will be kept confidential, if so requested, for as long as possible provided that this does not prejudice the enquiry.

Anonymous complaints are not covered by this procedure, but may be investigated or acted upon as the person receiving the complaint believes to be appropriate, having taken into account the seriousness of the issue raised, the credibility of the complaint, the prospects of being able to investigate an anonymous complaint and fairness to any individual mentioned in the complaint.

Any concerns raised will always receive a response and will be investigated by an independent person. Within ten working days of a concern being raised, the investigator will write to you:

- acknowledging the concern has been received
- indicating how it is proposed to deal with the matter
- giving an estimate of how long it will take to complete the investigation
- telling you whether any initial enquiries have been made
- supplying you with information on how *the Pavement* will support you if you think this is necessary.

The amount of contact between you and the person considering the matter will depend on both the nature of the matter raised, the potential difficulties involved and the clarity of the information provided.

Steps will be taken to minimise any difficulties which you might experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or other proceedings, arrangements will be made for you to receive appropriate advice.

While it cannot be guaranteed that all matters will be addressed in the way that you might wish, it will always be our intention to handle the matter fairly and properly. By using the policy, you will help achieve this.

If you do take the matter outside *the Pavement* you must ensure that you do not disclose confidential information.

In the event of your concern not being substantiated you should not take any subsequent action or make any disclosure to anyone other than those referred to in this policy.