



MammaKind

Whistleblower Policy

Overview

MammaKind believes that it is in everyone's interests for employees, volunteers, partners, service users or contractors who have genuine and reasonable concerns about misconduct or malpractice in the workplace to have an opportunity to raise those concerns in an atmosphere of mutual trust and confidence. This policy is intended to encourage personnel associated with MammaKind to report, in good faith, suspected or known occurrences of illegal or unethical events or activities without the fear of retribution.

Personnel are encouraged to come forward if they have genuine suspicions about wrongdoings at work and they will not be penalised for raising their concerns, provided that there is no malicious intent in the disclosure and it is made in good faith and on reasonable grounds. The policy provides a means of making such reports in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

Scope

This policy applies to MammaKind employees, trustees, volunteers, partners, service users, contractors, and any other individual coming into contact with MammaKind.

Policy Statement

It is the responsibility of all employees, volunteers and associated personnel to report concerns about known or suspected illegal or unethical activities in accordance with this policy.

Illegal or unethical activities include (but are not limited to) the issues listed below:

- Financial wrongdoing including theft, bribery, fraud and money laundering.
- Conduct that is an offence or breach of the law.
- Sexual misconduct, including sexual abuse, harassment or exploitation (see MammaKind Safeguarding Policy).
- Abuse or exploitation of children, vulnerable adults or service users (see Safeguarding Policy).
- Breach of MammaKind policies.
- Abuse of position.
- Actions causing danger to the health and safety of individuals or damage to the environment.
- Improper conduct or unethical behaviour.
- Activity which would bring the organisation into serious disrepute.
- The deliberate concealment of information relating to any of the matters listed above.

If you have a genuine concern and have a reasonable belief it is in the public interest, even if it is later discovered that you are mistaken, under this policy you will not be at risk of losing your job or volunteer position, or from suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously will have disciplinary action taken against them.

No whistleblower who reports a concern in good faith should suffer any harassment, retaliation or other negative consequences as a result of reporting the concern or cooperating in the investigation of a concern. Any such harassment or retaliation should also be reported according to the process outlined below. If a report of discrimination, retaliation



or harassment is proven, appropriate disciplinary action will be taken.

Reporting

Reporting Process:

Anyone can report a concern about suspected or known misconduct or malpractice conducted by MammaKind.

If you are an **employee, volunteer or contractor**, you should first raise the concern with **your supervisor**. If the concern relates to actions taken by your supervisor, the report should be made directly to the Chair of the Board of Trustees, Kirsty Lowe on: kirsty@mamakind.org.uk or 07980 649501.

For **anyone else**, concerns should be reported to:

- Chair of Trustees, Kirsty Lowe: kirsty@mamakind.org.uk / 07980 649501.
- Trustee, Katie Allen-East: ktkatjena@hotmail.com / 07837 139106.

At the point of raising a concern it would be useful for you to share information describing,

- Whether anyone is at immediate risk of harm?
- What happened? If possible, make note of dates, times, places, people.
- Who is involved?
- How do you know about it?
- When were you first concerned about it?
- Have you told anybody about it?
- Was any action taken?

MammaKind will respond accurately, completely and promptly to any whistleblower that reports a concern. The Head of Operations and/or Board of Trustees is responsible for investigating and coordinating corrective actions.

A decision will be made on whether it is appropriate to handle such complaints under this policy. Where not appropriate the complainant will be informed and their permission sought to divert the issue to an HR matter.

If the allegation relates to fraud, potential fraud or other financial irregularity the Treasurer will be informed and will determine whether the allegation should be investigated and the method of investigation.

When matters of Safeguarding are reported, the **MammaKind Safeguarding Policy** and procedures will be followed.

How the investigation proceeds depends on the nature and seriousness of the conduct or circumstances reported, and the quantity and quality of information provided. MammaKind will take steps to minimise any difficulties for the whistleblower during the investigation, for example by providing advice about any procedures they might be involved in and support mechanisms available. If applicable, an external whistleblower may be contacted to provide further information to support the investigation.

The person who made the report will be notified once the matter has been resolved, but outcomes are subject to confidentiality and in some cases specific results may not be able to be communicated.

Confidentiality:

All allegations will be treated in confidence and every effort will be made not to reveal a



whistleblower's identity unless they consent / request it or unless disclosure is required to comply with legal regulations.

Anonymous Allegations:

This policy encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may be difficult to prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the Head of Operations / Chair of Trustees. In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant.

Record Keeping:

A Register will be maintained, recording the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Head of Operations and Board of Trustees.

All documents related to the reporting, investigation, and enforcement of this policy shall be kept in accordance with MammaKind's Privacy Policy and applicable laws.

Responsibility for the Implementation of this Policy

MammaKind takes responsibility for achieving the objectives of this Policy, and endeavours to ensure compliance with relevant legislation and codes of practice. The cooperation of employees, volunteers and other associated personnel is also essential for the success of this Policy.

MammaKind reserves the right to amend and update this Policy at any time.

Revision Control

Approval / last review date:	9 October 2024
Next review:	October 2025
Reviewers:	Kirsty Noelle Lowe
	Juliet Campbell