

## 1.1 Charles and Elsie Sykes Trust Whistle Blowing Policy

### 1.1 Policy statement

The Charles and Elsie Sykes Trust is committed to operating with honesty and integrity. However, we are aware that there is always the potential risk of things going wrong from time to time, or of the Trust unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- to encourage trustees, the trusts advisers, and grant applicants to report suspected wrongdoing as soon as possible
- to provide trustees, advisers and grant applicants with guidance as to how to raise those concerns
- to reassure trustees, advisers and grant applicants that they are able to raise genuine concerns in good faith without fear of reprisals, even if they turn out to be mistaken

**This policy will be reviewed every two years, starting in June 2028**

### 1.2 What is whistle-blowing?

‘Whistle-blowing’ is the disclosure of information which relates to suspected wrongdoing.

This may include:

- criminal activity
- danger to health and safety
- failure to comply with any legal or regulatory requirements as set out by the Charity Commission
- bribery
- financial fraud or mismanagement
- negligence
- breach of our other policies and procedures
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters

A ‘whistle-blower’ is a person who raises a genuine concern in good faith relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a ‘whistle-blowing concern’) you should report it under this policy.

If you are uncertain whether something is within the scope of this policy you should seek advice from our Legal Secretary, Neil Shaw, whose contact details are at the end of this policy.

### 1.3 Raising a whistle-blowing concern

We hope that in many cases you will be able to raise any concerns with the Chair of the Trust. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Legal Secretary.

However, where the matter is more serious, or you feel that the Chair has not addressed your concern, or you prefer not to raise it with them for any reason, please contact the Legal Secretary.

### 1.4 Confidentiality

We hope that trustees, advisers and grant applicants will feel able to voice whistle-blowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to

keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

### **1.5 External 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.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. In the case of the Trust this would be the Charity Commission.

### **1.6 Investigation and outcome**

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any remedial action taken as a result. You should treat any information about the investigation as confidential.

### **1.7 If you are not satisfied**

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with the Legal Secretary.

### **1.8 Protection and support for whistle-blowers**

Whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support those who raise genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Those raising concerns must not suffer any detrimental treatment because of raising a concern in good faith. Detrimental treatment includes being removed as a trustee or adviser, or a grant applicant being barred from future applications for grant funding. If you believe that you have suffered any such treatment, you should inform the Legal Secretary immediately.

### **1.9 Responsibility for the success of this policy**

The Chair of the Trust has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Chair, in conjunction with the Trustee Board, should review this policy from a legal and operational perspective every 3 years.

All trustees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Trustees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chair of the Trust.

