

Catch22 policy

Whistleblowing policy

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Catch22 reserves the right to amend this policy, following consultation, where appropriate.

Policy Owner:	<i>People Team</i>
Queries to:	<i>peopleservices@catch-22.org.uk</i>
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Catch22 group, entity, hub:	<i>Catch22 Group</i>
4Policies level (all staff or managers only)	<i>All Staff</i>

Document Version Control & Changes

Version	Last modified	By	Changes Made
1.0	01/03/2019	People Team	Policy created
2.0	01/09/2023	People Team	Policy updated
3.0	01/06/2024	People Team	Policy updated to include a trustee
4.0	10/06/2025	People Team	Policy updated inserting roles and responsibilities for management of the policy.

1. Summary

Catch22 is committed to the highest possible standards of openness and accountability across the organisation. The Catch22 values (compassion, collaboration, curiosity and empowering) and the organisational behaviour framework sets out the core standards that are integral for us as an organisation to achieving this ambition.

Catch22 actively encourages open and honest communication and seek to create a culture where our colleagues, partners and other stakeholders can confidently raise concerns.

This Whistleblowing Policy is intended to encourage and enable employees to raise serious concerns within Catch22 rather than overlooking a problem or “blowing the whistle” outside. But the policy also provides guidance on how individuals can exercise their right to raise concerns externally should they wish to do so.

2. What is the policy about?

This policy is designed to ensure that all who work, subcontract or volunteer for Catch22 know how to disclose information they believe shows malpractice, unethical conduct or illegal practices. The policy sets out our commitment to protecting and supporting individuals who report such concerns without fear of victimisation, subsequent discrimination or disadvantage.

Whistleblowing can be defined as “the raising of a concern, either within the workplace or externally, about a danger, risk, malpractice or wrong doing which affects others”.
(Whistleblowing Commission’s Code of Practice).

Examples of a whistleblowing include (not exhaustive):

- Conduct which is a criminal offence or a breach of law.
- Disclosures related to past, current or likely miscarriages of justice.
- Health and safety risks, including risks to the public as well as other employees.
- Damage to the environment.
- The unauthorised use of funds.
- Possible fraud and corruption.
- Sexual, physical or verbal abuse.
- Other unethical conduct.

Any serious concerns that you have about any aspect of service provision or the conduct of Catch22 or others acting on behalf of Catch22 can be reported under the Whistleblowing Policy. This may be about something that:

- Makes you feel uncomfortable in terms of known standards, your experience or the standards you believe Catch22 subscribes to.
- Is against Catch22’s Policies and Procedures.
- Amounts to improper conduct.

The Whistleblowing Policy does not replace Catch22 grievance or complaints procedures. If you wish to raise concerns as an external stakeholder please use the complaints policy and if you wish to raise concerns regarding your own employment, please use the grievance procedure.

If you have health and safety concerns, we encourage you to raise these first with your line manager or the Health and Safety Officer.

It is possible that in the course of your work for Catch22, you may identify an act by a third party, not acting on our behalf or part of our service provision arrangements, which raises a serious concern in your mind. Any such issues should be reported using the routes set out in this policy. While Catch22 cannot undertake to directly investigate such matters it will raise these on your behalf with the relevant agency.

3. Who is the policy for?

This policy applies to all Catch22 employees, workers, partners, stakeholders and volunteers. It has been discussed with union representatives and has their support.

4. Policy statement

This policy aims to:

- Encourage you to feel confident in raising serious concerns and to question and act upon concerns about practice.
- Provide avenues for you to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimisation if you have a reasonable belief that you have made any disclosure in the public interest.

5. Roles and responsibilities

Role	Responsibilities
Chief Officer Group	• Approving and endorsing the policy • Promoting an open and transparent culture where staff feel empowered to report suspicions of wrongdoing without fear of reprisals.
Governance, risk and internal audit committee	• Reviewing and monitoring whistleblowing arrangements.

Role	Responsibilities
	The Chair of the Committee acts as a champion for whistleblowing arrangements and the Chair is a point of contact for raising concerns.
People Team	- Maintaining, implementing and overseeing this policy, including keeping records of concerns raised, their outcomes and feedback given. - They will support with investigations, ensuring matters are looked into in a timely manner.
Managers	- Ensuring that they respond appropriately to all concerns raised, and that these concerns are investigated properly. - Ensuring that their staff are aware of this policy and procedure. - Ensuring that appropriate support arrangements are put into place for staff who raise concerns.
Staff	Raising relevant concerns that they have under this policy.

6. How does the Whistleblowing policy work?

5.1 Protected Disclosure

In order to make a protected disclosure, you must have a reasonable belief that the issue you wish to “blow the whistle” about is in the public interest. It is important to bear in mind that you do not have to be correct in your belief or have proof of alleged wrongdoing, but you must have a reasonable belief that wrongdoing has been or is likely to be committed. You have no responsibility for investigating the matter - it is Catch22's responsibility to ensure that an investigation into your disclosure takes place.

5.2 Safeguards: Harassment or Victimisation

Employees are often the first to realise that there may be something wrong, and therefore it is important that employees raise concerns so that issues can be dealt with as soon as possible, and to prevent any further possible damage or losses.

Catch22 recognises however that individuals may be worried about raising such a concern, perhaps through a sense of disloyalty to colleagues, uncertainty about the issue or because they fear victimisation or reprisals.

Catch22 is committed to running the organisation in the best way possible and to do so we need your help. We have introduced this policy to reassure you that it is safe and acceptable to speak up and to enable you to raise any concern you may have about malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.

Employees making a disclosure in good faith will not suffer any disadvantage as a result of raising a concern. They are protected by both the Public Interest Disclosure Act and this policy. Catch22 will not tolerate the detrimental treatment, harassment or victimisation of anyone raising a genuine concern. This includes attempts to deter individuals from raising concerns. Any such instances will be dealt with through the Disciplinary Policy.

These guarantees apply regardless of the outcome of the investigation, including where the concern is unfounded.

5.3 Confidentiality

If you so wish, all concerns will be treated in confidence and every effort will be made not to reveal your identity. At the appropriate time, however, you may need to come forward as a witness. In such circumstances, we will discuss this with you before disclosing your identity, including arrangements that can be put in place to support you. We do however encourage everyone to raise concerns openly as this will enable us to most effectively assess and investigate the issue.

However, before you choose to make an anonymous allegation, you should consider the following:

- It may be more difficult to investigate the concern or take any action as, for example, it may not be possible to confirm the allegation from other sources or ask you for follow up information.
- You are unlikely to receive feedback on your concern.
- You may not be afforded all protections under this policy and the law as there will be no evidence that it was you who raised the concern.

5.4 Untrue Allegations

If you express a concern that is in the public interest, but it is not confirmed by the investigation, no action will be taken against you.

However, if you make an allegation which is held to be done frivolously, vexatiously, maliciously or for personal gain, disciplinary action may be taken against you.

6.5 How to Raise a Concern

As a first step, you should normally raise concerns with your immediate manager or their senior. You may already have a departmental procedure you can use. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. If you believe that management is involved, you can contact your People Business Partner, or senior managers in the Governance, People or Health & Safety teams via the email link Ihaveaconcern@catch-22.org.uk

In the event that you have a concern that you do not feel you can report in confidence to the HR team or the governance teams. You can raise your concern in confidence to the Chair of the Catch22 governance, risk and internal and audit team (claire.starza-allen@catch-22.org.uk).

Concerns may be raised orally initially, but should be confirmed in writing. Employees, workers or volunteers who wish to make a written report are invited to use the following format:

- The background and history of the concern (giving relevant dates); and
- The reason why you are particularly concerned about the situation.

The earlier you express the concern the easier it is to take action. Although you are not expected to prove beyond all reasonable doubt the truth of an allegation, you will need to demonstrate to the person contacted that on the balance of probabilities there are reasonable grounds for the concern you have raised.

Advice/guidance on how to pursue matters of concern may be obtained from:

- Your People Business Partner
- Or your own Director
- You can also report and get advice about fraud or internet crime by calling “Action Fraud” a section of the police on 0300 123 2040 (text-phone 0300 123 2050).

– **having first taken note of the provisions of paragraph 5.8 of this policy.**

You may invite your trade union, professional association representative or a workplace colleague to be present during any meetings or interviews in connection with the concerns you have raised. Anyone who helps you will need to respect the confidentiality of the investigation.

5.6 How Catch22 Will Respond

Catch22 will respond to your concerns as soon as is practical. Do not forget that testing out your concerns is not the same as either accepting or rejecting them.

Where appropriate, the matters raised may:

- Be investigated by an external investigator, management, internal audit, or through the disciplinary process;
- Be referred to the police.
- Be referred to the external auditor.
- Be referred to the appropriate LADO (Local Authority Designated Officer for Safeguarding); and/or
- Form the subject of an independent inquiry, for example, through the Area Child Protection Committee for child abuse.

In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. The overriding principle that Catch22 will have in mind is the public interest. Concerns or allegations that fall within the scope of specific Catch22 or statutory procedures will normally be referred for consideration under those procedures.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

Within ten working days of a concern being raised, a representative of the People Team or Director will write to you:

- Acknowledging that the concern has been raised.
- Indicating how Catch22 propose to deal with the matter.
- Giving an estimate of how long it will take to provide a final response.

- Telling you whether any initial enquiries have been made.
- Supplying you with information on staff support mechanisms; and
- Telling you whether further investigations will take place and if not, why.

The amount of contact between those considering the issues and you will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, Catch22 will seek further information from you.

Where any meeting is arranged, off-site if you so wish, you can be accompanied by a trade union or professional association representative or a workplace colleague

Catch22 will take steps to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings Catch22 will arrange for you to receive advice about the procedure and where appropriate financial or other support.

Catch22 recognises that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

As the investigation progresses, you will be kept informed as to any developments, as far as is possible under the constraints that may apply to Catch22.

5.7 The Responsible Officer

The Chief People Officer has overall responsibility for the maintenance and operation of this policy. A record will be maintained of all concerns raised and the outcomes (but in a form which does not endanger your confidentiality) and will report as necessary to the Organisational Leadership Team and the Trustee Audit Committee.

In the event you have concerns around the responsible officer for this policy, this can be escalated to the Chair of the governance, risk and audit committee (claire.stanza-allen@catch-22.org.uk).

5.8 How the Matter can be Taken Further

This policy is intended to provide you with an avenue within Catch22 to raise and resolve concerns. Catch22 hopes you will be satisfied with any action taken. If you are not, and on the basis that you have exhausted Catch22's internal mechanisms for consideration of your

concern, you have the option to take the matter outside Catch22. The following are possible contact points:

- The external auditor;
- Your trade union;
- Your local branch of Citizens' Advice;
- Relevant professional bodies or regulatory organisations;
- A relevant voluntary organisation; or
- The Police.
- A list of prescribed people and bodies can be found on the government website.

[Whistleblowing: list of prescribed people and bodies - GOV.UK](#)

If you do take the matter outside Catch22, you should be careful to adhere to data protection guidelines. You should check with the People Business Partner before such disclosures are made or alternatively with your trade union, professional advisor or Citizen's Advice for guidance.

Lastly, if your concern relates to a third party organisation with whom you have come into contact during the course of your work, but who is not acting on behalf of Catch22, and you are dissatisfied with the response you have received via Catch22 (who will have raised the matter on your behalf), you may also choose to raise this matter externally – although first taking care that your disclosure is “protected” and that you do not include any unrelated confidential information regarding Catch22, its employees, workers or volunteers, stakeholders or service users.

5.9 Interplay with Grievance Policy

If you have chosen to include a “protected disclosure” as a part of a formal grievance then this may, at Catch22s discretion, be investigated and you will receive a response, under the terms of that policy. If you remain dissatisfied with the outcome of the grievance process you will not be able to additionally raise the same, or essentially the same, matters under this policy.

6 How will the policy be monitored

The Governance, Risk and Internal Audit Committee has delegated responsibility to maintain oversight of the Whistleblowing Policy, including approving any changes to the policy to the

Chief Officer Group. The Chief People Officer will produce an annual report to the governance, risk and internal audit committee which will identify any patterns of concern and assess the effectiveness of the policy.

7 Related policies

- Complaints policy
- Bullying and Harassment policy
- Disciplinary policy
- Grievance Policy

Annex 1: Equality Impact Assessment

1. Summary

This EIA is for:	Whistleblowing Policy
EIA completed by:	Christina Duru, Chief People Officer
Date of assessment:	10 June 2025
Assessment approved by:	Christina Duru, Chief People Officer

Catch22 is committed to always: avoiding the potential for unlawful discrimination, harassment and victimisation; advancing equality of opportunity between people who share a protected characteristic and those who do not; and, foster good relations between people who share a protected characteristic and those who do not.

An Equality Impact Assessment (EIA) is a tool for identifying whether or not strategies, projects, services, guidance, practices or policies have an adverse or positive impact on a particular group of people or equality group. Whilst currently only public bodies are legally required to complete EIA's under the Equality Act 2010, Catch22 has adopted the process in line with its commitment to continually improve our equality performance.

Policy owners are required to complete or review the assessment indicating whether the policy has a positive, neutral or negative impact for people who it applies to and who share one or more of the 9 protected characteristics under the Equality Act 2010.

Definitions are based on the Equality & Human Rights (EHRC) guidance.

Objectives and intended outcomes
This EIA has been completed in order to ensure that the implications and potential impact, positive and negative, of this policy have been fully considered and addressed, whether or not people share a protected characteristic.

2. Potential Impacts, positive and negative

Equality Area	Positive	Neutral	Negative	Please give details including any mitigation for negative impacts
Age Does this policy impact on any particular age groups or people of a certain age?	☐	☒	☐	The policy applies equally to all members of staff regardless of age. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their age.
Disability Does this policy impact on people who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities?	☐	☒	☐	The policy applies equally to all members of staff regardless of health/disability. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of their disability.
Gender reassignment (transsexual, transgender, trans) Does this policy impact on people who are transitioning from one gender to another (at any stage)	☐	☒	☐	The policy applies equally to all members of staff regardless of their gender at any given time. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because of gender.
Pregnancy and maternity (in work this is linked to maternity leave, non-work this is for 26 weeks after giving birth) Does this policy impact on people who are pregnant or in their maternity period following the birth of their child?	☐	☒	☐	It's not considered that the policy positive or negatively impacts on pregnant women or on staff on maternity or paternity leave,
Race Does this policy impact on people as defined by their race, colour and nationality (including citizenship) ethnic or national origins	☐	☒	☐	The policy applies equally to all members of staff regardless of their race, origin, colour or nationality. It's not considered that the policy includes any guidance or rules that may impact

				either positively or negatively in these respects.
Sexual orientation Does this policy impact on people who are sexually attracted towards their own sex, the opposite sex or to both sexes?	☐	☒	☐	The policy applies equally to all members of staff regardless of their sexual orientation. It's not considered that the policy includes any guidance or rules that may impact either positively or negatively on any member of staff because their sexual orientation.

3. More information/notes

Please add any links to key documents or websites to evidence or give further detail on any impacts identified.