Document Folder:	Managing People / Induction	Effective Date:	25/08/2026
Document Name:	Whistleblowing Policy	Expiry Date:	31/08/2027

Whistleblowing Policy

Ensuring Transparency, Accountability, and Protection for Raising Concerns

Version: 7

1. Introduction

The Living Room (TLR) wants people to speak up when they reasonably believe that wrongdoing is happening, has happened or is likely to happen. Raising concerns early helps us protect people, improve our services and act with integrity.

TLR will listen to concerns, respond fairly and take reasonable steps to protect anyone who raises a genuine concern from detrimental treatment.

2. Purpose and scope

This policy explains what whistleblowing is, how to raise a concern and what TLR will do in response. It applies to employees, workers, agency workers, apprentices, volunteers and trustees across TLR's centres, shop, services and activities.

Whistleblowing law protects most workers who make a protected disclosure. Volunteers and trustees are not usually covered by the statutory protection, but TLR encourages them to use this policy and will support them in the same spirit.

3. What is whistleblowing?

Whistleblowing is raising information about wrongdoing that the person reasonably believes is in the public interest. This usually means that the concern affects, or could affect, other people, clients, the organisation or the wider public rather than being solely a personal employment matter.

A concern may relate to wrongdoing that has happened, is happening or is likely to happen, including:

1. a criminal offence, fraud, bribery or corruption
2. a failure to comply with a legal obligation
3. a miscarriage of justice
4. a danger to health or safety
5. damage to the environment
6. sexual harassment, including a concern about a wider pattern, risk or organisational response
7. abuse, neglect, exploitation or serious mistreatment of a client or another person
8. serious safeguarding failures
9. serious misuse of charitable funds or resources
10. serious breaches of TLR policies, professional standards or codes of conduct
11. deliberate concealment of any of the above

> **Sexual harassment and whistleblowing:**
> A person can use the Sexual Harassment Policy or Grievance Policy for an individual complaint. A disclosure about sexual harassment may also be protected under whistleblowing law where the person reasonably believes it is in the public interest. TLR will help identify the appropriate process and will not reject a concern because it was initially raised under the wrong policy.

4. Concerns that are not usually whistleblowing

A concern about an individual's own employment, such as working relationships, management decisions, bullying directed only at them, pay or working conditions, will usually be handled under the Grievance and Complaint Policy.

A client complaint will usually be handled under the Client Complaints Policy. However, information showing wider wrongdoing, risk to others or deliberate concealment may still be whistleblowing. HR or the Whistleblowing Officer will help decide the appropriate route.

5. Our commitments

1. Concerns will be taken seriously and considered without pre-judgement.
2. The person raising the concern does not need to prove the wrongdoing or investigate it themselves.
3. Information will be shared only where necessary to assess or investigate the concern, subject to legal and safeguarding duties.
4. No one will be disadvantaged for raising a concern they reasonably believe to be true, even if it is not upheld.
5. Knowingly making a false allegation or deliberately misleading an investigation may be addressed under the Disciplinary Policy. A concern that is mistaken or not upheld is not, by itself, a malicious allegation.

6. How to raise a concern

A concern may be raised verbally or in writing. The person should explain what they believe has happened, who may be involved, relevant dates and any information or documents they already have. They should not delay reporting or put themselves at risk to obtain further evidence.

1. **Line Manager:** Raise the concern with your line manager where this feels appropriate.
2. **Whistleblowing Officer:** Raise the concern directly with the CEO if it is serious, involves your line manager, or you would prefer not to approach them.
3. **Chair of Trustees:** Raise the concern with the Chair if it involves the CEO, or if there is another good reason why the CEO should not handle it.

If there is an immediate risk to a person's safety, follow TLR's safeguarding or emergency procedures first. Call 999 where there is an immediate danger or suspected crime requiring an urgent response.

7. What happens after a concern is raised

1. **Acknowledgement:** TLR will normally acknowledge the concern within five working days and confirm who is handling it.
2. **Initial assessment:** The concern will be assessed to identify immediate safety, safeguarding, legal or regulatory action and decide the most appropriate process.
3. **Investigation:** Where an investigation is needed, it will be carried out by a person with suitable independence and experience. External support may be used where appropriate.
4. **Updates:** The person who raised the concern will be kept informed as far as reasonably possible. TLR may not be able to share confidential personal information or the detail of disciplinary action.
5. **Outcome and action:** TLR will take proportionate action where concerns are upheld and will review whether wider learning or improvements are needed.

8. Confidentiality and anonymous concerns

TLR will respect a request for confidentiality as far as reasonably possible. It may be necessary to disclose limited information to investigate, meet safeguarding or legal duties, or give another person a fair opportunity to respond. Where possible, this will be discussed with the person who raised the concern first.

Anonymous concerns will be considered, but anonymity can make it harder to clarify information, investigate fully or provide feedback. Anyone raising a concern is encouraged to provide a safe way for the investigator to contact them.

9. Protection from detrimental treatment

TLR will not tolerate dismissal, victimisation, bullying, harassment, threats, exclusion, loss of opportunities or any other detrimental treatment because a person raised, supported or participated in a genuine whistleblowing concern.

Anyone who believes they have experienced detrimental treatment should tell the CEO or Chair of Trustees promptly. Appropriate action will be taken, which may include action under the Disciplinary Policy.

10. Independent advice and external disclosures

TLR encourages concerns to be raised internally where possible so they can be addressed promptly. A person may seek confidential advice before deciding what to do.

1. Protect, the independent whistleblowing charity: protect-advice.org.uk or 0203 117 2520
2. Acas: acas.org.uk
3. a trade union or independent legal adviser

In some circumstances, a disclosure may be made to an appropriate prescribed regulator or other body. The legal conditions are different depending on who receives the disclosure, so independent advice should be sought where possible. Nothing in this policy prevents lawful reporting to the police, a regulator or another prescribed person.

11. If the person remains concerned

If the person believes their concern was not considered properly, they may ask the Chair of Trustees for a review. The request should explain what they believe was missed or handled incorrectly. A trustee or other person who was not materially involved will review the handling of the concern and confirm the outcome in writing, normally within 15 working days.

A review considers whether the concern was handled fairly and appropriately; it may not be possible to provide confidential information about other people or employment action.

12. Records, monitoring and learning

Whistleblowing records will be stored securely, with access limited to those who need it. Personal information will be handled in accordance with TLR's Data Protection and Confidentiality Policy and retention arrangements.

The CEO will report anonymised themes, significant risks and organisational learning to the Board of Trustees. Information that could identify the person raising the concern will not be included unless this is necessary and lawful.

13. Related policies

1. Sexual Harassment Policy
2. Grievance and Complaint Policy for Employees
3. Disciplinary Policy
4. Diversity, Equality, Equity and Inclusion Policy
5. Safeguarding Adults at Risk Policy
6. Child Safeguarding Policy
7. Client Complaints Policy
8. Data Protection and Confidentiality Policy

14. Policy ownership and review

Policy owner: CEO (Whistleblowing Officer)

Oversight: Board of Trustees

This policy will be reviewed bi-annually and sooner where legislation, guidance, organisational learning or a significant concern indicates that a review is needed.

15. Review history

Version	Date	Author	Purpose
V1	12/04/2017	AA	Created
V2	27/07/2017	AA	Updated and reviewed
V3	21/12/2020	AA	Updated and reviewed
V4	15/08/2022	AA / RC	Updated related policies and compliance references
V5	16/01/2025	AA	Reformatted, checked legislation and added review process
V6	25/08/2026	AA	Full review; added sexual harassment as a qualifying disclosure and strengthened plain-language process, protection and oversight