



Whistleblowing Policy



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Introduction

The aim of this procedure is to provide a clear and transparent way for all members of the band to raise genuine concerns about acts of wrongdoing or malpractice within the organisation. It also aims to ensure that any concerns are dealt with effectively and in a timely fashion.

This procedure provides the Committee and specifically the Chairperson and the Designated Officer / Deputy Designated Officer with steps to deal with allegations, ensuring that members are not penalised for raising genuine concerns, even if those concerns prove to be unfounded. It also provides the means for taking disciplinary action against anyone who is found to have raised false concerns with malicious intent.

The procedure does not apply to concerns about safeguarding children, young persons or adults at risk or allegations about a member relating to such matters. Concerns or allegations of this nature should be dealt with by following the procedures outlined in the band's policy on 'Safeguarding Children, Young Persons and Adults at Risk'.

How does a member raise a concern about malpractice

If you have a concern about malpractice then you should speak to the Chairperson or the Designated Officer / Deputy Designated Officer. If your concern relates to one of these members, then it may be necessary for another committee member to also be involved to support the member you have spoken to.

The member you have approached should arrange to meet with you as soon as possible to discuss your concern. This meeting can take place away from the band room if necessary. You will be told at the meeting, or as soon as possible afterwards, what action will be taken to address your concern. It may not be possible to tell you the full details of the outcome, as this could relate to confidential third party information. If no action is to be taken in relation to your concern, you will also be informed of this fact and given the reasons why.

If you do not want the person you have concerns about to know your identity, you should make this clear to the officer dealing with your concern at the earliest opportunity. Every effort will be made to respect your wishes, but it cannot be guaranteed that your identity will not be disclosed. If this is the case, you will be informed and any issues you may have about this will be discussed with you.

If you need support in raising your concern, you may bring another member with you, however consideration should be taken to respect the confidentiality of the concern.

What to do if a member raises a concern with you about malpractice

If someone tells you they are concerned about the actions of another member, you should arrange to meet them as soon as possible. If you are not the person responsible for dealing with these matters, you should establish why they have chosen to discuss the concern with you. You should then suggest that the person speaks to that member and offer to support them to do this. You should not, however, refuse to hear what the person has to say.



You should approach the situation sensitively, recognising the discomfort that the person may feel. Offer to meet them away from the band room if they wish, but ensure you are protected and not alone if this person is under 18. You should also remind the person with the concern about other sources of support that might be available to them such as the NSPCC, a Local Authority Designated Officer for Safeguarding, or Citizens Advice.

If the person reporting the concern wants their identity to be kept confidential, you should explain that this will be done if possible, but that it may not be achievable. Make notes of your discussions with the individual, and check the accuracy of your notes with them.

Deciding what action to take

Once you have established the nature of the concern, it may be of a relatively minor nature and you may decide to resolve it informally. If the concern appears more serious, you must consider first whether any immediate action is needed to protect children or an adult at risk. If so, you should check the safeguarding procedures to consider what action to take.

You should also consider whether there is a need to involve the police and / or other statutory services e.g. health. If so, you should contact the Designated Officer / Deputy Designated Officer to discuss the matter further.

If you are not the person responsible for dealing with concerns i.e. Chairperson, Designated Officer / Deputy Designated Officer, you should refer the matter to the appropriate member, who will decide what action to take.

Conducting an investigation

Unless the matter is relatively minor and can be dealt with informally, the responsible officer should arrange for an investigation to be completed as swiftly as possible. The investigation should also be demonstrably thorough and impartial.

The scope of the investigation will be determined by the nature of the concern. Witnesses may need to be consulted and records may need to be scrutinised. It is also possible that advice may be needed from someone with specialist knowledge in the area of concern.

Once the investigation is completed, a report should be produced summarising the nature of the concern, the investigation process and the outcome, including specific recommendations. Take measures to preserve the anonymity of the person who raised the concern, if this has been their wish. If the concerns are not upheld, this should also be made clear. If the concern is upheld and the person at the centre of it is found to have been culpable or remiss in some way, the report's recommendations should be carried out using a clear plan of action. The plan may include the use of disciplinary action, training, coaching, counselling, the implementation of new policies or procedures, or a referral to the Disclosure and Barring Service and / or Local Authority if required.

If it becomes apparent during the course of the investigation that a criminal offence may have been committed, the police should be informed. Your own investigation may have to be suspended on police advice, if they decide that they need to become involved. The person who raised the concern should be informed of the outcome, but not the details of any



disciplinary action. It may be appropriate for the person who raised the concern to be offered support or counselling.

If the concern is unfounded and the person who raised it is found, through the process of investigation, to have acted maliciously or out of a desire for personal gain, it may be appropriate to consider disciplinary action against them.

Recording a concern

The responsible officer should make accurate notes of each stage of the process, including the discussions during meetings, regardless of whether the concern is dealt with formally or informally.

Copies of these notes should be given to the person who is the subject of the concern. The person who raised the concern should also be given copies of notes from their discussion. Notes made during the investigation and the report of the investigation, together with any notes relating to the outcome, should be kept securely and in a manner that complies with data protection requirements. If they were to be requested by an investigating authority, these notes should not reveal the identity of the person who reported the concerns.

Adoption

This policy was adopted at a meeting of the Committee of Comber Brass held on 6th October 2021 and is signed below on behalf of all the trustees.

James McClure James McClure (as Chairperson) Date 6/10/21

Jane Smyth Jane Smyth (as Secretary) Date 13.10.21.

Granville Lavin Granville Lavin (as Treasurer) Date 6/10/21