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SNAP WHISTLEBLOWING POLICY

1. Our Commitment

SNAP is committed to maintaining the highest possible standards of openness, integrity, probity and accountability. In line with this commitment, SNAP expects all employees, volunteers, workers and others with whom it works to raise any serious concerns they may have regarding any aspect of SNAP's work, conduct, services or practices.

This policy provides a clear and appropriate process for raising concerns and sets out how those concerns will be considered and dealt with.

This policy applies to all individuals working for or on behalf of SNAP, including:

- Full-time and part-time employees
- Self-employed workers and contractors
- Temporary and agency workers

- Work experience students and placements
- Volunteers
- Trustees, where applicable
- Any other individuals working within or on behalf of SNAP

2. Aims of This Policy

The aims of this policy are to:

- Encourage individuals to feel confident in raising concerns and to question or challenge practices where appropriate.
- Provide clear and appropriate channels through which concerns can be raised confidentially.
- Ensure that concerns are taken seriously, investigated appropriately and responded to in a timely manner.
- Provide appropriate feedback on any action taken as a result of a concern being raised.
- Ensure individuals understand how they can pursue their concerns if they are not satisfied with the response.
- Reassure individuals that they will be protected from victimisation, harassment, bullying or other detrimental treatment when they raise a genuine concern in good faith.
- Promote an organisational culture where concerns can be raised openly, responsibly and without fear of reprisal.

SNAP recognises that deciding to report a concern can be difficult. However, where an individual has a genuine and reasonable belief that something is wrong, they should feel confident in raising that concern.

By raising a concern, an individual may help to protect colleagues, learners, service users, volunteers, the organisation and members of the wider community.

SNAP will not tolerate harassment, victimisation, bullying or any other form of detrimental treatment towards an individual who raises a genuine concern in good

faith. Appropriate action will be taken to protect individuals who raise concerns under this policy.

3. Confidentiality

All concerns raised under this policy will be treated sensitively and, wherever possible, confidentially.

Every reasonable effort will be made to protect the identity of the individual raising the concern where confidentiality has been requested. However, there may be circumstances where an individual's identity needs to be disclosed as part of an investigation, safeguarding process, legal requirement or other formal procedure.

Wherever reasonably possible, the individual will be informed if their identity needs to be disclosed.

Individuals should be aware that, in some circumstances, they may be required to provide evidence or act as a witness as part of an investigation.

4. Types of Concerns

Concerns that may be raised under this policy include, but are not limited to:

- Conduct that may constitute a criminal offence or breach of the law.
- Failure to comply with legal, regulatory or organisational requirements.
- Concerns relating to a miscarriage of justice.
- Health and safety risks to employees, learners, service users, volunteers, visitors or members of the public.
- Actions that may cause harm to the environment.
- Unauthorised or inappropriate use of SNAP funds, resources or property.
- Suspected fraud, financial misconduct or corruption.
- Sexual, physical, emotional or other forms of abuse or neglect.
- Safeguarding concerns relating to children, young people or vulnerable adults.
- Unethical, dishonest or inappropriate conduct.

- Serious professional misconduct.
- Actions that are unprofessional, inappropriate or contrary to SNAP's expected standards of behaviour.
- Serious breaches of organisational policies or procedures.
- Any other serious concern relating to the way SNAP operates or delivers its services.

Where a concern relates specifically to safeguarding, individuals should follow SNAP's safeguarding procedures in addition to, or instead of, this policy where appropriate.

5. Procedure for Raising a Concern

Where possible, individuals should raise their concern with an appropriate member of SNAP's management or leadership team.

Concerns may be raised verbally or in writing. Individuals should provide as much relevant information as possible, including:

- The nature of the concern.
- What has happened or is believed to have happened.
- When and where the incident or concern occurred.
- The names of individuals involved, where known.
- Any relevant documentation or supporting evidence.
- The names of any witnesses, where appropriate.

Concerns should be raised as soon as reasonably possible so that SNAP can consider and respond to them appropriately.

If an individual feels unable to raise their concern internally, they may be able to raise it with an appropriate external organisation, regulator or prescribed person or body, depending on the nature of the concern.

An individual may consider raising a concern externally where they reasonably believe that:

- The concern may be covered up or not dealt with appropriately.
- They may suffer unfair or detrimental treatment if they raise the concern internally.
- The concern has already been raised internally but has not been adequately addressed.
- There is another legitimate reason why raising the concern directly with SNAP would not be appropriate.

6. Responsibilities of Individuals Raising Concerns

Individuals raising a concern are expected to:

- Raise concerns honestly and in good faith.
- Have a reasonable belief that the information they are providing is true.
- Provide accurate and relevant information wherever possible.
- Cooperate appropriately with any investigation that may follow.
- Maintain confidentiality where requested and appropriate.
- Avoid making malicious, deliberately misleading or knowingly false allegations.
- Not use the whistleblowing process to seek personal gain.
- Understand that matters which are more appropriately dealt with through another SNAP policy or procedure may be redirected to the relevant process.

7. Protection from Victimisation

SNAP is committed to ensuring that individuals who raise genuine concerns in good faith are treated fairly and are not subjected to harassment, bullying, victimisation or other detrimental treatment as a result of raising a concern.

Any allegation of victimisation, harassment or retaliation against an individual who has raised a genuine concern will be taken seriously and may be subject to further investigation and appropriate action.

SNAP will take reasonable steps to support and protect individuals who raise concerns under this policy.

8. False or Malicious Allegations

SNAP recognises that concerns may sometimes be raised which, following investigation, are not substantiated. This does not mean that the individual has acted improperly, provided that they genuinely believed the concern to be true and raised it in good faith.

However, knowingly making false, malicious or deliberately misleading allegations, or deliberately using the whistleblowing process for personal gain or to cause harm to another individual, may result in disciplinary or other appropriate action.

9. Management of Concerns

All concerns raised under this policy will be considered appropriately and proportionately.

Depending on the nature and seriousness of the concern, SNAP may:

- Undertake an internal investigation.
- Refer the matter to an appropriate manager or senior leader.
- Initiate safeguarding procedures.
- Refer the matter to an external organisation, regulator or statutory body where appropriate.
- Take disciplinary or other appropriate action.
- Implement measures to prevent similar concerns arising in the future.

Where appropriate and subject to confidentiality and legal requirements, the individual who raised the concern will be informed of the outcome or actions taken.

SNAP will ensure that concerns are handled fairly, objectively and without unnecessary delay.

10. Policy Review

This policy will be reviewed regularly to ensure that it remains effective, appropriate and compliant with relevant legislation, guidance and good practice.

All employees, workers and volunteers are expected to familiarise themselves with this policy and to raise serious concerns where they believe this is necessary.