

## **ALEXANDRA PARK AND PALACE** **CHARITABLE TRUST BOARD**

**18<sup>th</sup> JULY 2017**

**Report Title:** Whistleblowing Policy

**Report of:** Catherine Solomon, Head of HR and Organisational Development

**Report Authorised by:** Louise Stewart, Chief Executive Officer, Alexandra Park and Palace Charitable Trust (APPCT)

Contact Officer: Natalie Layton, Executive Assistant, APPCT  
Email: [Natalie.layton@alexandrapalace.com](mailto:Natalie.layton@alexandrapalace.com) , Telephone: 020 8365 4335

### **Local Government (Access to Information) Act 1985**

N/A

#### **1. Purpose:**

- 1.1 Alexandra Park and Palace Charitable Trust (APPCT) has a responsibility to be transparent ensuring our reputation and maintaining public confidence in everything we do.
- 1.2 There is a responsibility to ensure that any fraud, misconduct or wrongdoing is reported and properly dealt with and individuals are able to raise concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run.
- 1.3 There is no current whistleblowing policy in place, adopting this policy and practice will encourage a culture where concerns are reported early, which makes it easier to address concerns and potentially avoid serious regulatory breaches, reputational damage or external disclosures.
- 1.4 To clearly communicate APPCT commitment to ensure concerns are properly dealt.

## **2. Recommendations**

- 2.1 To approve and support the implementation of the proposed Whistleblowing Policy.
- 2.2 To authorise the Chair of the Trustee Board to sign this document on behalf of Alexandra Park and Palace Charitable Trust.

## **3. Background**

- 3.1 The law provides protection for individuals who raise legitimate concerns about specified matters. This means that they have the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.
- 3.2 These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by an individual who has a reasonable belief that one of the following acts is being, has been, or is likely to be, committed:
  - a criminal offence;
  - a miscarriage of justice;
  - an act creating risk to health and safety;
  - an act causing damage to the environment e.g. Pollution incident;
  - financial irregularities;
  - act of bribery;
  - harassment of a colleague, customer or other individual
  - a breach of any other legal obligation; or
  - concealment of any of the above.
- 3.3 The recommendations in this report were endorsed by the Finance, Risk and Audit Committee at its meeting on 27<sup>th</sup> June 2017.

## **4. Whistleblowing Policy**

The Policy is attached at Appendix 1 and sets out:

- the procedure for raising concerns;
- APPCT and APTL approach to handling the matter;
- how to escalate concerns;
- the process for report the matter to the proper authority.

## **5. Legal Implications**

- 5.1 The Council's Assistant Director of Corporate Governance has been consulted in the preparation of this report, and having consulted with the Council's Head of Audit and Risk Management provided comments on the proposed policy for the consideration of the report author. It is further understood that the policy has been drafted in line with "Charity Commission Regulation", and so the Council's Assistant Director of Corporate Governance has no further comments.

## **6. Financial Implications**

- 6.1 Council's Chief Financial Officer has been consulted in the preparation of this report, and has no comments.

## **7. Use of Appendices**

Appendix 1 – Whistleblowing Policy