

# **PACE (Practical Actions for Climate and the Environment) Whistleblowing Policy and Procedure**

## **About this Policy and Procedure**

PACE (Practical Actions for Climate and the Environment) is registered charity (Number 1204980), working with local communities, to take positive actions to address the changing climate, to build biodiversity, and to build resilience within the community. As the Trustees for PACE, we endeavour to act ethically and with integrity at all times, in how we conduct ourselves and our work within the community.

The Board of Trustees meets approximately every 8 weeks to discuss potential projects and activities, and we hope to maintain an atmosphere and environment where we can each take personal responsibility for our conduct, and also feel safe and confident to challenge one another when necessary, regarding our decision making. Conflict and disagreements are a natural and healthy part of this process, and each Trustee should feel able to challenge views and raise concerns. Indeed, this is part of what makes us more effective and collectively responsible as a group.

However, should a situation arise, whereby a Trustee, a PACE volunteer (or in future a member of staff) feels there is wrong-doing or has significant concerns about the conduct of another Trustee or Trustees, or PACE volunteers (or member of staff), and they do not feel this can be raised safely or with confidence in this forum, then the following policy aims to guide them in the next steps they can and should take.

It's imperative that any fraud, misconduct or wrongdoing by volunteers, staff or others working on behalf of our organisation is reported and dealt with properly.

This document sets out how you should report concerns and how we'll deal with them.

## **What is Whistleblowing?**

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who make a 'qualifying disclosure'.

A qualifying disclosure is where an employee or volunteer has a reasonable belief that any of the following is being, has been, or is likely to be committed, and reports (discloses) it in the public interest.

- A criminal offence
- A miscarriage of justice
- An act causing risk to health and safety
- An act causing damage to the environment
- A breach of any other legal obligation
- Concealment of any of the above

This is also known as 'whistleblowing'.

You don't need to prove your disclosure – a reasonable belief is enough. You are not responsible for investigating the matter – it's the responsibility of PACE to ensure an investigation takes place.

If you make a qualifying disclosure you have the right not to be dismissed or victimised as a result. An example of victimisation would be an employer deciding not to promote someone because they've made a disclosure.

If you want to make a qualifying disclosure, we recommend you follow the procedure set out in this document.

## Policy principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff, volunteers and others working on behalf of the charity should look out for illegal or unethical conduct and report anything they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- No employee, volunteer or other person working on behalf of the charity will be victimised for raising a matter under this procedure. This means your rights and opportunities at work won't be affected if you raise a legitimate concern.
- Victimisation of an individual for raising a qualifying disclosure is a disciplinary offence.
- If we discover misconduct as a result of any investigation under this procedure, we'll follow our disciplinary procedure and take other appropriate measures.
- Maliciously making a false allegation is a disciplinary offence.
- Instructing someone to cover up wrongdoing is a disciplinary offence. If you're told not to raise or pursue a concern, even by someone in a position of authority, you shouldn't agree to remain silent. You should report the matter to the chief executive or the chair of the Board of Trustees.

## Whistleblowing procedure

This procedure is for disclosures about matters other than a breach of a contract of employment. (You should raise matters relating to your contract of employment by following our complaints procedure

[https://www.pacemanningtree.org.uk/files/ugd/b2739f\\_4f9d700ca7844183a7ccd6d40210ccb5.pdf](https://www.pacemanningtree.org.uk/files/ugd/b2739f_4f9d700ca7844183a7ccd6d40210ccb5.pdf))

### Stage one

If you want to make a qualifying disclosure, you should raise it with one of the Trustees, who will arrange an investigation of the matter. We may ask you and other individuals involved to

write a statement to support the investigation. Any investigation will be carried out in accordance with the principles set out above. Your statement will be considered, and you'll be asked to comment on any additional evidence we obtain during the investigation. The Trustee will take any necessary action, including reporting the matter to the chair of the Board of Trustees and any appropriate government department or regulatory agency. Once the investigation is complete, you'll be told the outcome and what we have done, or propose to do, about it. If we won't be taking action, we'll explain why.

## **Stage two**

You should escalate the matter to the chair of the Board of Trustees if you are concerned that the Trustee:

- is involved in the wrongdoing
- has failed to investigate properly
- has failed to report the outcome of the investigation to the right people

The chair will arrange for the investigation to be reviewed, make any necessary enquiries, and make their own report to the board.

## **Stage three**

If following stages one and two you reasonably believe that the appropriate action hasn't been taken, or you feel unable to speak with a Trustee, or the chair of the Board of Trustees in confidence, you should report the matter to the relevant body. This includes:

- HM Revenue & Customs
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority
- The Competition and Markets Authority
- The Independent Office for Police Conduct.

GOV.UK has published [the full list of prescribed people and bodies for whistleblowing](#).

## **Data Protection**

When someone makes a disclosure, we'll process any personal data we collect in accordance with our data protection policy. This data will be held securely and only accessed and disclosed to individuals to help us deal with the disclosure.

## **End of Whistleblowing Policy and Procedure**

Agreed by Board of Trustees on 9 January 2025. To be reviewed within 2 years.