



People Policies and Procedures

Raising a Concern Procedure

1 Raising your concerns

Who should you raise your concern with?

We hope that in many cases you will be able to raise any concerns with your line manager, or the Advice and Casework Team. You can tell them in person or put the matter in writing if you prefer. They may be able to agree on a way of resolving your concern quickly and effectively.

If you feel unable to raise the matter with your line manager, please raise the matter with the [Head of Compliance](#) by email.

If you feel that the matter is quite serious and you cannot discuss it with any of the above, please contact someone from the list below. Please be aware that any of the below may deem it appropriate to refer the issues raised, directly to the relevant experts in the organisation.

- **Chief Executive** – MAdamson@redcross.org.uk
- Our **Freedom to Speak Up Guardian (FTSUG)** - as a provider of NHS services under contract, we have a Guardian in place whose role is to provide, at any stage of raising a concern, support and advice to staff who want to speak up. The Guardian has access to anyone in the British Red Cross, including the Chief Executive, or if necessary, outside the organisation, according to the FTSUG guidance in [Annex 3](#). The FTSUG is the [Chief Operating Officer \(COO\)](#) and - members of the workforce can contact them by phone ([02078777233](tel:02078777233)) on or by email on coooffice@redcross.org.uk.

If a Freedom to Speak Up Guardian is contacted, they will follow the process set out under this policy, and depending on the circumstances, will seek technical advice from the Head of Compliance, Head of Internal Audit, Head of People Advisory, and/or from outside the organisation.

- If the concern involves the Chief Operating Officer, the Chief Executive, the Board or Committee members, we have a non-executive FTSUG representative from our Board of Trustees, namely the [Vice Chair](#), who should be contacted by email on lhalpin1@gmail.com.

2 Our Assurances to you

It is understandable that whistle-blowers are sometimes worried about possible repercussions like losing their job or suffering any form of reprisal as a result. We encourage openness and support staff members who raise genuine concerns under this policy, even if they turn out to be mistaken.

We do not tolerate any harassment, victimisation, or detrimental treatment of anyone raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, please contact the [Head of Compliance](#), or the [Chair of Finance and Audit Committee \(FAC\)](#) - Liz Hazell or the [Advice & Casework](#) or our external auditors. Contact details are set out in [Appendix 2](#) at the end of this procedure.

You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

Confidentiality

Anyone making a disclosure should feel assured that information will only be shared during the investigation on a 'need to know' basis. However, we recognise there may be situations when you would prefer to speak to someone confidentially first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we won't without your consent unless required by law. But there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

If you are not able to raise your concern openly or even confidentially, you may raise your concern anonymously. However, it should be made very clear that concerns raised anonymously are much more difficult to investigate and if we do not know who you are, we cannot provide feedback or protect your position. Anonymous concerns will be considered after taking into account the seriousness of the issue, the credibility of the disclosure, the likelihood of being able to investigate the matter and fairness to any individual mentioned in the disclosure.

3 How your concern will be dealt with?

When you raise a concern, please let us know how you would like the matter to be resolved. Depending on the type of concern raised, some concerns may be dealt with informally during everyday business.

For more serious concerns, we will carry out a proportionate investigation and will reach a conclusion in a reasonable timescale. We aim to act promptly, however, since each case is unique, the timescales can vary. We will keep you informed.

Initial meeting

Depending on how you have raised your concern, an appropriate person will arrange a meeting with you as soon as possible to discuss your concerns. You have the right to be accompanied, as set out below, to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter in a follow-up email.

Right to be accompanied

You will be offered the opportunity to be accompanied by a work colleague (including a volunteer), an accredited trade union representative or a staff association representative at any meeting under this policy.

The name and details of the companion should be shared with the Advice and Casework Team at least 24 hours prior to a meeting.

Acting as a companion is voluntary and colleagues are under no obligation to do so. If they agree to do so they will be allowed reasonable time off from duties without loss of pay to act as a companion.

If your chosen companion is unavailable at the time a meeting is scheduled and will not be available for more than 7 calendar days afterwards, you may be asked to choose someone else.

At the discretion of the Advice and Casework Team, you may be allowed to bring a companion who is not a colleague or union representative (for example, a family member) if this will help overcome a disability, or if English is not your first language.

Your companion should be allowed to address the meeting to put and sum up your case, respond on your behalf to any views expressed at the meeting and confer privately with you during the hearing. Your companion does not, however, have the right to answer questions on your behalf or address the meeting.

Investigation and Outcome

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.

In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to disclose the details about the precise actions we take where this would infringe a duty of confidence we owe to another person.

N.B: If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

4 If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we aim to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 1 at the start of this procedure. Alternatively, you may contact the [Head of Internal Audit](#) or the Chair of Finance and Audit Committee (FAC) - Liz Hazell LizHazell@redcross.org.uk or the [Advice & Casework team](#) or our external auditors. Contact details are set out at the end of this policy.

5 External Disclosures

While we hope this procedure gives you the assurance you need to raise your concern internally with us, however, we recognise that there can be circumstances where it may be appropriate to report your concerns to an external body such as a regulator.

We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, [Protect](#), operates a confidential advisory helpline. They can provide you expert advice in deciding how best to raise your concerns, advising you on what protection you are entitled to and what you can do if things go wrong. They also have a list of prescribed regulators in case you wish to report certain types of concern. Their contact details are at the end of this policy along with a full list of potential external bodies and their contact details in [Appendix 2](#).

N.B: Please note that Protect cannot investigate or report your whistleblowing concerns. They can only provide you advice on your concerns and how best you can raise them.

If you don't want to use the existing internal procedures for reporting, you can use [SafeCall](#) to report them externally. Safecall is an impartial, external ethics hotline service that helps members of the workforce to report their concerns related to their working environment, in a safe and secure manner. The Safecall service is available

24/7/365 days by contacting [0800 915 1571](tel:08009151571) (for UK based calls). Further information on SafeCall can be found on [Redroom](#).

N.B: [The Head of Compliance](#) is responsible for reviewing the report provided by Safecall and deciding how the concern should be addressed.

Appendix 1 – Contact Information of Key Contacts

Key Contact	Contact Information
Advice and Casework Team	Email: HR@redcross.org.uk
Head of Compliance	Email: AmandaHarvey@redcross.org.uk
Chief Executive	Email: MAdamson@redcross.org.uk
Freedom of Speak Up Guardian (FTSUG)	RedRoom: Chief Operating Officer (COO) Phone: 02078777233 Email: coooffice@redcross.org.uk
Vice Chair	Email: lhalpin1@gmail.com
Head of Internal Audit	Email: MikeSlade@redcross.org.uk
Chair of Finance and Audit Committee (FAC)	Email: LizHazell@redcross.org.uk
Employee Assistance Programme (EAP)	Website: www.healthassuredeap.co.uk Phone: 0800 028 0199 (within UK), +44 161 836 9498 (outside UK. Calls will be charged)

Appendix 2 – External Bodies

A. External support agencies for people considering blowing the whistle

Name of the Organisation	Contact Information
<u>Protect</u> , for free confidential advice related to your concern	Website: https://protect-advice.org.uk/contact-protect-advice-line/ Phone: 0800 668 1326 Contact Form: https://protect-advice.org.uk/contact-protect-advice-line/
<u>Safecall</u> , for reporting whistleblowing concerns related to working environment	Website: https://www.safecall.co.uk/report Phone: 0800 915 1571 (within the UK) From outside UK, please click here . Email: britishredcross@safecall.co.uk
* <u>Speak Up</u> , for free-phone service for employees and organisations working within the NHS and social care sector, in independent living and/or health and social care services.	Website: https://speakup.direct/ Phone: 08000 724 725

* When we asked, the Speak Up helpline advised that they would accept calls from volunteers and staff from **health and social care service**.

B. Other External bodies with which a concern can be raised

Name of the Organisation	Contact Information
Modern Slavery Helpline	Phone: 0800 0121 700 - Open 24 hours a day Calls can be made anonymously. Free from landlines and most mobile phones
The Gangmasters Licensing Authority	Phone: 0800 432 0804. Free calls from a UK landline to report your concerns in confidence. Lines are open Monday to Friday 9:00am - 5:00pm Email: intelligence@gla.gsi.gov.uk
UK Only	
Financial Conduct Authority	Address: 25 The North Colonnade, Canary Wharf, London, E14 5HS. Website: www.fca.org.uk Phone: 020 7066 9200 Email: whistle@fca.org.uk (Intelligence Department (Ref PIDA))
National Audit Office	Address: 7 Buckingham Palace Road, Victoria, London, SW1W 9SP Phone: 020 7798 7000 / 020 7798 7264
Information Commissioner's Office (For serious breaches of data protection)	Website: www.ico.org.uk Phone: 0303 123 1113

Medicines and Healthcare Products Regulatory Agency	Address: 151 Buckingham Palace Road, Victoria, London, SW1W 9SZ Phone: 0121 230 6720 / 0121 230 6666 Email: info@gamblingcommission.gov.uk
Gambling Commission	Address: Victoria Square House, Victoria Square, Birmingham, B2 4BP Phone: 0121 230 6720 / 0121 230 6666 Email: info@gamblingcommission.gov.uk
External Auditors	Address: Deloitte LLP, 3 Victoria Square, Victoria St, St Albans, AL1 3TF
England Wales and Scotland Health and Safety Executive	Website: www.hse.gov.uk
England and Wales Charity Commission	Website: www.charitycommission.gov.uk
England Only Care Quality Commission (CQC) Responsible for checking whether Hospitals, Care homes, GPs, Dentists, Services in your home and other regulated services such as transport are meeting national standards	Phone: 03000 61 61 61 Email: enquiries@cqc.org.uk

Wales Only	
Wales Audit Office	Address: 24 Cathedral Road, Cardiff, CF11 9LJ Phone: 029 2032 0500 Textphone: 029 2032 0660
Care and Social Services Inspectorate Wales Responsible for social services and care homes	Website: www.cssiw.org.uk
Health Inspectorate Wales Responsible for all NHS-funded care (including independent hospitals).	Website: www.hiw.org.uk Phone: 029 2092 8850
Department for Health and Social Services (Wales)	Website: www.wales.gov.uk Phone: 0845 010 3300 (English) 0845 010 4400 (Welsh)
Scotland Only	
Care Inspectorate	Website: www.careinspectorate.com Phone: 0845 600 9527

Scottish Social Services Council (SSSC)	Website: www.sssc.uk.com Phone: 0845 6030 891
Audit Scotland	Website: www.audit-scotland.gov.uk Phone: 0845 146 1010
Healthcare Improvement Scotland	Website: www.healthcareimprovementscotland.org Phone: 0131 623 4300 (Edinburgh) 0141 225 6999 (Glasgow)
The Scottish Government Health and Social Care Directorate	Website: www.scotland.gov.uk Phone: 0131 556 8400 or 0845 7741 741
Office of the Scottish Charity Regulator (OSCR)	Website: www.oscr.org.uk Phone: 01382 220 446
Northern Ireland	
Regulation and Quality Improvement Authority Northern Ireland	Website: www.rqia.org.uk Phone: 028 9051 7500
Department of Health, Social Services and Public Safety (Northern Ireland)	Website: www.dhsspsni.gov.uk Phone: 028 9052 0500

Charity Commission for Northern Ireland	Website: www.charitycommissionni.org.uk Phone: 028 3832 0220
Health and Safety Inspectorate Northern Ireland	Website: www.hseni.gov.uk Phone: 0800 0320 121
Crown Dependencies	
<u>Jersey</u> States of Jersey, Health and Social Services Department	Website: www.gov.je Phone: 01534 442 000
<u>Guernsey</u> States of Guernsey, Health and Social Services Department	Website: www.gov.gg Phone: 01481 725 241
<u>Isle of Man</u> Isle of Man Government, Department of Health	Website: www.gov.im Phone: 01624 642 608

<u>Isle of Man</u> Health and Safety at Work Inspectorate Isle of Man	Website: https://www.gov.im/categories/business-and-industries/health-and-safety-at-work/ Phone: 01624 685881
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Appendix 3 – Freedom to Speak Up Guidance

Introduction

The Freedom to Speak Up Guardian (FTSUG) is an independent and impartial source of advice available at any stage of raising a concern and provides an additional resource within the Raising a Concern process. This guidance sets out the purpose, expectations and role of the FTSUG within the British Red Cross.

Purpose

Aimed to encourage staff to speak up, the FTSUG will make sure a culture of speaking up is instilled throughout the BRC. The FTSUG role is a requirement of the BRC being an NHS contractor and represents another mechanism for the BRC to actively encourage an open safe culture for people to flag problems.

Expectations

The FTSUG is expected to operate independently, impartially and objectively; and seek guidance and support from and, where needed, escalate matters to appropriate individuals within the BRC and external bodies.

The FTSUG should follow the process as set out under Section 2 of the Raising a Concern Procedure and, if circumstances require, may seek technical advice from the Head of Internal Audit, HR Expert Service Advice and/or outside the organisation.

The FTSUG should be supported with the resources they need to ensure that they meet the needs of BRC staff and volunteers. Their views on the impact of activities and decision on *Freedom to Speak Up* should be actively sought.

Role

Executive and Non-Executive FTSUGs

The FTSUG role is held by two individuals: The Chief Operating Officer (COO) at the **executive** level; and the Vice-Chair **non-executive** level, who should be contacted if the matter relates to the Chief Operating Officer (CPO), the Chief Executive Officer (CEO), the Board or Committee members.

Main Responsibilities

FTSUGs are responsible for taking action to promote the following outcomes:

- > Staff and volunteers have the capability, knowledge, and skills they need to speak up themselves and to support others to speak up;
- > Speaking up processes are effective and constantly improved.
- > Senior leaders role-model effective speaking up.
- > Barriers to speaking up are identified and tackled;
- > Information provided by speaking up is used to learn and improve