NAPA Whistleblowing Policy

Owner	Finance and Operations Manager	**Approval**	CEO on behalf of the NAPA Trustees
Version	1.0	**Effective date**	30 September 2026
Evaluate	Annual	**Review**	30 September 2029

1. Purpose

NAPA is committed to honesty, accountability and a culture in which people can raise serious concerns safely.

This policy:

- explains what whistleblowing is;
- provides confidential internal reporting routes;
- protects people who raise genuine concerns;
- establishes fair assessment and investigation arrangements;
- identifies appropriate external reporting options;
- enables the Board to address wrongdoing and organisational risk.

NAPA would prefer to identify and address wrongdoing early. No one should ignore a serious concern or attempt to conceal it.

2. Scope

This policy applies to:

- employees and workers;
- agency workers;
- contractors and consultants;
- trainees and people undertaking work experience;
- certain self-employed people working for NAPA;
- volunteers;
- trustees;
- others who obtain information about wrongdoing through their relationship with NAPA.

Statutory whistleblowing protection applies to legally defined workers and certain other protected categories. Volunteers and trustees may not always have identical statutory rights, but NAPA will apply its non-retaliation commitments to them as a matter of policy.

3. What Is Whistleblowing?

Whistleblowing is the disclosure of information that the reporter reasonably believes shows wrongdoing affecting others or the public interest. It is different from a personal grievance about the reporter's own employment, although a concern may contain both whistleblowing and grievance elements. NAPA will identify the appropriate process and will not require a person to use legal terminology.

4. Types of Concern

A qualifying concern may relate to:

- a criminal offence;
- fraud, theft, bribery or corruption;
- breach of a legal obligation;
- miscarriage of justice;
- danger to health or safety;
- environmental damage;
- safeguarding failures;
- abuse or neglect;
- misuse of charitable or restricted funds;
- serious governance failure;
- deliberate concealment of wrongdoing;
- serious data-protection or cyber-security breaches;
- regulatory non-compliance;
- tax evasion or facilitation;
- modern slavery or exploitation;
- another serious matter affecting NAPA's beneficiaries, work or public interest.

The concern may relate to past, current or likely future wrongdoing.

5. Matters Normally Handled Elsewhere

The following are normally addressed under another policy:

- an individual employment complaint - Grievance Procedure;
- dissatisfaction with a service - Complaints Policy;
- safeguarding concern - Safeguarding Policy;
- personal-data incident - Data Protection incident procedure.

Where a disclosure includes public-interest wrongdoing, NAPA will preserve its whistleblowing character even if another procedure also applies.

6. Who to Contact

A concern may be raised with any of the following:

- the employee's manager;
- the Chief Executive;
- the Chair of Trustees;
- another unconflicted trustee where the concern involves the Chair.

A reporter does not need to use their management chain.

A concern involving the Chief Executive must be directed to the Chair. A concern involving the Chair must be directed to another unconflicted trustee.

7. Emergencies and Immediate Risk

If there is an immediate risk of serious harm or a crime in progress, the reporter should contact the emergency services or appropriate statutory authority. The concern should also be reported internally as soon as it is safe, so NAPA can protect people and preserve evidence. Safeguarding concerns must be escalated promptly to the Designated Safeguarding Lead unless that person is implicated.

8. How to Raise a Concern

A concern may be raised verbally or in writing.

The reporter should provide, where possible:

- what they believe has occurred or may occur;
- relevant dates and locations;
- people or organisations involved;
- why they believe the matter is serious or in the public interest;
- supporting information or documents;
- any immediate risk;
- whether they have raised it previously;
- any concern about retaliation or confidentiality.

The reporter is not expected to prove wrong doing or investigate it personally.

9. Reasonable Belief

A person will be protected under this policy where they raise information honestly and reasonably believe that it indicates wrongdoing. The concern does not need to be proven or ultimately upheld. A mistaken concern raised on a reasonable basis will not result in action against the reporter. The reporter's motive does not, by itself, remove statutory protection where the legal requirements for a protected disclosure are met.

10. Anonymous Reports

NAPA accepts anonymous disclosures.

Anonymous reporting may limit NAPA's ability to:

- clarify information;
- assess credibility;
- protect the reporter;
- provide updates;
- investigate fully.

Where possible, an anonymous reporter should use a safe method that allows follow-up communication without revealing their identity.

11. Confidentiality

NAPA will protect the reporter's identity as far as reasonably possible. Identity may need to be disclosed where:

- it is necessary for a fair investigation;
- safeguarding requires it;
- the law requires disclosure;
- police or a regulator lawfully requests it;
- evidence must be used in formal proceedings;
- the reporter agrees.

NAPA will discuss foreseeable disclosure with the reporter where possible. No one can be guaranteed absolute confidentiality.

12. Initial Response

NAPA will normally:

- acknowledge a named concern within five working days;
- identify the person responsible for assessment;
- consider immediate safety and safeguarding action;
- manage conflicts of interest;
- preserve relevant evidence;
- determine whether external notification is required;
- decide whether investigation is appropriate;
- explain the next steps where possible.

Urgent concerns will be acted upon immediately.

13. Assessment

The assessor will consider:

- the nature and credibility of the information;
- immediate harm or loss;
- whether another procedure applies;
- whether senior leaders or trustees are implicated;

- whether independent investigation is required;
- whether police, regulators, insurers or funders must be contacted;
- whether a serious charity incident may have occurred;
- the need to protect the reporter and others.

The person whose conduct is questioned must not control the assessment.

14. Investigation

Where investigation is appropriate, NAPA will appoint a sufficiently independent and competent investigator.

The investigation may involve:

- interviews;
- review of records and systems;
- financial or technical analysis;
- safeguarding enquiries;
- specialist professional advice;
- liaison with external authorities;
- recommendations for corrective action.

NAPA may delay or modify an internal investigation where police, a regulator or another authority advises that it could prejudice an external process.

15. Fairness to People Implicated

A person accused of wrongdoing will be treated fairly and will normally have an opportunity to respond before an adverse finding is reached.

NAPA may temporarily restrict information or access where necessary to:

- protect people;
- preserve evidence;
- prevent interference;
- maintain confidentiality;
- comply with an external investigation.

Interim action does not imply guilt.

16. Updates and Outcome

NAPA will seek to keep a named reporter informed about:

- whether the concern is being considered;
- the general progress of the process;
- significant delays;
- whether action has been taken.

NAPA may be unable to disclose:

- confidential employment action;
- personal data;
- safeguarding details;
- legally privileged information;
- information that could prejudice proceedings;
- another person's confidential information.

The reporter may be told that the matter has concluded without receiving every finding or sanction.

17. Protection from Detriment

NAPA prohibits retaliation against anyone who raises, supports or provides information about a concern in good faith.

Retaliation may include:

- dismissal;
- disciplinary action;
- threats or intimidation;
- bullying or exclusion;
- reduction of duties or opportunities;
- adverse references;
- withholding training or promotion;
- pressure to withdraw;
- breach of confidentiality;
- ending a volunteer or contractual relationship because of the report.

Suspected retaliation should be reported immediately to the CEO. Retaliation may result in disciplinary or other formal action.

18. Support

NAPA will consider:

- a named contact;
- adjustments to duties or reporting lines;
- wellbeing support;
- time to attend meetings;
- signposting to independent advice;
- protection from contact with implicated individuals;
- measures to preserve professional relationships.

Support measures will be agreed with the reporter where possible and must not become a disguised penalty.

19. External Disclosures

Nothing in this policy prevents a person from making a protected disclosure externally where the statutory requirements are met.

Depending on the concern, an appropriate external body may include:

- the Charity Commission for England and Wales;
- the Office of the Scottish Charity Regulator;
- the Health and Safety Executive;
- the Information Commissioner's Office;
- the Fundraising Regulator;
- HM Revenue & Customs;
- the Financial Conduct Authority;
- the Care Quality Commission or another care regulator where relevant;
- police;
- a local authority safeguarding service;
- a professional regulator;
- an auditor or independent examiner;
- another prescribed person.

Different legal tests apply to wider disclosure, including disclosure to the media. A person considering such disclosure may wish to obtain independent advice.

20. Advice

Potential whistleblowers may seek confidential advice from:

- Protect, the whistleblowing charity;
- Acas;
- a trade union;
- a solicitor;
- a relevant professional body;
- another appropriate adviser.

Seeking advice does not prevent use of NAPA's internal process.

21. Confidentiality Clauses

Nothing in a NAPA contract, settlement agreement, policy or instruction is intended to prevent:

- protected whistleblowing;
- reporting a crime;
- safeguarding disclosure;
- cooperation with a regulator;
- obtaining legal or medical advice;

- another disclosure protected or required by law.

22. Maliciously False Reports

A person who knowingly fabricates a report for malicious purposes may be subject to the applicable conduct procedure. A concern that is mistaken, unproven or not upheld is not automatically malicious. NAPA will not threaten action merely because evidence is incomplete.

23. Records and Data Protection

NAPA will securely retain:

- the disclosure;
- risk assessments;
- evidence;
- investigation records;
- decisions;
- external referrals;
- support and protection measures;
- remedial actions.

Access will be restricted. Records will be retained according to legal and organisational requirements.

24. Board Oversight

The Board will receive anonymised assurance about:

- number and type of concerns;
- response times;
- investigations and outcomes;
- retaliation allegations;
- external referrals;
- recurring themes;
- completion of corrective actions.

Material concerns will be reported promptly rather than waiting for routine reporting. The Board will review the effectiveness and independence of reporting routes at least annually.