



Whistleblowing Policy

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1. Purpose and scope

- 1.1 Crescent Purchasing Consortium (referred to as 'CPC', 'the company' or 'the Charity') is committed to the highest standards of honesty, openness and integrity and expects the same high standards from all its people – employees ("you"), volunteers, contractors and agency workers.
- 1.2 However, CPC recognises that there may be occasions when its people do not get this right. CPC aims to promote and foster a culture of openness and therefore encourages everyone to raise all genuine and serious issues which are of concern through this policy.
- 1.3 CPC wants its people to feel safe to speak up. This is welcome as it helps the charity identify opportunities for improvement that might not otherwise be known. This policy sets out the way in which employees may raise any concerns and how those concerns will be dealt with.

2. Aims of the policy

- 2.1 The aims of this policy are to.
 - Ensure everyone is aware of what to do and the appropriate person to notify in the event of concerns around serious malpractice, breaches of regulations or criminal offences.
 - Provide a simple but effective way for you to raise serious concerns.
 - Ensure that you receive appropriate feedback on any action undertaken by CPC as a result of a concern being raised.
 - Ensure that you are protected from reprisals or victimisation for having raised the concern in good faith.
 - Signpost you to further options available if you are not satisfied with the response you receive.
 - Allow the charity to take action against anyone who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so.
- 2.2 CPC is committed to treating all concerns raised consistently and fairly.
- 2.3 CPC is committed to taking all reasonable steps to maintain the confidentiality of the whistleblower where requested (unless there is a legal obligation to disclose).

3. Definition of whistleblowing

- 3.1 Whistleblowing is the term used when an employee passes on information concerning wrongdoing. In this policy, it may be referred to as "making a disclosure" or "blowing the whistle". The wrongdoing will typically (although not necessarily) be something you have witnessed at work.

- 3.2 To be covered by whistleblowing legislation, an employee who makes a disclosure must reasonably believe two things. The first is that they are acting in the public interest. This means, in particular, that personal grievances and complaints are not usually covered by whistleblowing legislation.
- 3.3 The second thing is that the whistleblower must reasonably believe that the disclosure tends to show past, present or likely future wrongdoing falling into one or more of the following categories:
- Criminal offences (this may include, for example, types of financial impropriety such as fraud).
 - Failure to comply with an obligation set out in law.
 - Miscarriages of justice.
 - Endangering of someone's health and safety.
 - Damage to the environment.
 - Covering up wrongdoing in the above categories.
- 3.4 Whistleblowing involves reporting illegal or unethical behaviour that affects others, often to someone in authority or a regulatory body, while a grievance is a formal complaint about specific issues affecting an individual, such as unfair treatment or workplace conditions. Grievances should be made in line with the Grievance procedure.

4. How to make a disclosure (blow the whistle)

- 4.1 You can make a disclosure verbally, though written disclosures are preferred. The disclosure should provide the following information.
- The background and context of the concern, including relevant dates, venues and names etc.
 - A clear statement as to the reason why the situation causes concern.
- 4.2 Where you are unsure about raising a concern because you do not know if it is relevant or whether it falls within this policy, you are encouraged to come forward so that the matter can be discussed and advice given.
- 4.3 You must state that you are raising your concern using the Whistleblowing policy and whether you wish your identity to be kept confidential. CPC will make every effort to maintain confidentiality though, depending on the consequences this may not always be possible. Where this is the case, you will be informed of this and the reasons why it was not possible.
- 4.4 You should raise your concerns as soon as possible. This makes it easier to act and to enable any problems to be resolved or reported quickly. CPC will consider anonymous disclosures but does not encourage them as anonymity often makes it difficult to properly investigate concerns, protect others or give feedback on outcomes.

5. Who to make a disclosure to

- 5.1 You should always raise the matter with the Managing Director.
- 5.2 Where a concern is about members of the GLT or the Managing Director you may contact a board trustee by email on GroupTrustees@thecpc.ac.uk.
- 5.3 Where appropriate, the person in receipt of the concern may arrange for the matter to be investigated externally and independent of CPC and for appropriate follow-up to be taken.
- 5.4 There may be an occasion where the disclosure may be against a CPC customer or member. This could particularly occur within a placement contract. Where you have a concern that illegal or unethical behaviour has, is or could happen at a customers or members institution then you should raise the matter with the Managing Director.

6. What happens upon receipt of a disclosure

- 6.1 The disclosure will be acknowledged within five working days.
- 6.2 The Managing Director will ensure that the Board of trustees are properly informed about the nature of concerns being raised.
- 6.3 The Managing Director will ensure the disclosure is recorded in the Complaints register and will appoint a member of the GLT to investigate the concern.
- 6.4 The investigator will arrange to meet you as soon as possible, away from the workplace if necessary to find out the facts and check any details. You may be accompanied at this meeting by a colleague.
- 6.5 At the meeting you will have the opportunity to detail the reasons for the disclosure and share any concerns and supporting information.
- 6.6 You may be asked to provide a written statement.
- 6.7 You will be informed at the meeting or as soon as possible afterwards what action will be taken to address the concern. The investigator will keep you informed as to the likely duration of the investigation and where action is not taken, an explanation as to why. The action taken will be dependent on the nature of the concern. The matters raised may result in one or more of the following.
 - No action required.
 - Action being taken under another CPC policy or procedure.
 - An internal investigation under this policy.
 - A referral to the police or relevant statutory body.
 - A referral to CPC's external auditors.
 - A referral to the Charity Commission.
 - An independent enquiry.

7. Raising a disclosure externally

- 7.1 In most cases disclosures should be resolved internally and not require raising externally.
- 7.2 In exceptional or urgent circumstances however, or where you are not happy with the outcome, you have a legal right to make a disclosure to prescribed bodies. These include the following.
- The Charity Commission
 - HM Revenue & Customs
 - The Information Commissioner (ICO)
 - The Health and Safety Executive
 - The Financial Conduct Authority
 - The Environment Agency
- 7.3 When using this policy, you should seek advice internally, via your line manager or the Head of People Development about speaking up and the extent of the protection available before reporting a concern to anyone externally.
- 7.4 You can seek independent advice by contacting the charity Protect (formerly Public Concern at Work) on 020 3117 2520.
- Website: <https://protect-advice.org.uk/contact-protect-advice-line/>
- 7.5 This body is an independent charity staffed by lawyers, which offers confidential free legal and practical advice on how people can raise concerns about malpractice at work. They can also provide advice about what legal protection may be available to the whistleblower.
- 7.6 It is important to note that similar to the rights and obligations of an employee, CPC reserves the right to make a referral to any of the above agencies without the whistleblower's consent.

8. Disclosures to the press

- 8.1 Disclosures to the press will not be considered reasonable and may constitute misconduct. As such, the matter might be treated as a disciplinary matter in accordance with the Disciplinary policy.

9. Protecting individuals using this policy

- 9.1 It is understandable that you may be worried about possible repercussions if you raise a concern. The law provides protection for "whistleblowers" who report genuine concerns to ensure you are not treated unfairly by raising a concern. CPC encourages openness and will support any whistleblower who raises a concern under this policy, even if it turns out to be mistaken.

- 9.2 It is not necessary for you to provide proof that such an act worthy of disclosure is being, has been or is likely to be committed. You do, however, need to hold a reasonable belief of such an action having been, being or likely to be carried out.
- 9.3 Whistleblowers who make a disclosure have the right not to be dismissed, subjected to any other detriment, or victimised. This is the case even were it to materialise that you were genuinely mistaken. CPC will not tolerate any individual being subjected to a detriment because of making a disclosure in good faith.
- 9.4 Detriment means you experience one or both of the following because you made a disclosure.
- Being treated worse than before.
 - Having your situation made worse.
- 9.5 Examples of detriment could be.
- Reducing your hours.
 - Causing you to experience bullying.
 - Causing you to experience harassment.
 - Turning down a training request without good reason.

10. Malicious disclosures

- 10.1 Should it be found that you have maliciously raised a matter which you know to be untrue, or you are involved in any way in the malpractice, wrongdoing or illegal acts or omissions, your behaviour may be addressed through the Disciplinary policy.

11. Further help, support and assistance for employees

- 11.1 You can access free, confidential counselling from the Employee Assistance Programme (EAP) if you require further external support. This is accessed by their website: www.employeeassistance.org.uk using access code: **Crescent Purchasing** or contacting the helpline on 0800 328 1437.

12. Sensitivity and confidentiality

- 12.1 All employees involved with a disclosure, including witnesses, must keep the matter strictly confidential and act with appropriate sensitivity to all parties.
- 12.2 Any reports or investigations will be handled confidentially. Information will only be shared with those directly involved in the investigation or as required by law.
- 12.3 If any employee is found to have breached confidentiality or acted without due care or sensitivity in a case of a disclosure, CPC may take disciplinary action against the employee in line with the Disciplinary policy.

13. Data protection

13.1 CPC will process any personal data collected in accordance with the Data Protection policy. Personal data collected in the course of a disclosure or investigation is held securely and accessed by, and disclosed to, employees only for the purposes of dealing with the disclosure or investigation.

14. Equality, diversity and inclusion

14.1 CPC is an equal opportunity employer. This is not only a legal requirement underpinned by the Equality Act 2010 but is also a commitment from CPC. As an employer, CPC embraces equality, diversity and inclusion (EDI) and seeks to ensure that its policies are free from unlawful or unfair discrimination and underpin the Charity's values.

15. Related policies

15.1 The following policies in conjunction with this policy are available to all employees.

- Disciplinary policy
- Grievance procedure
- Code of Conduct