

Whistleblowing Policy

Policy implemented: December 2018
Last reviewed: March 2025
Next review due: February 2027

1. Summary

Salutem Care and Education is committed to the highest standards of transparency, integrity, and accountability in all aspects of its operations. We encourage all employees, contractors, and individuals involved with our organization to raise concerns about any wrongdoing or malpractice without fear of reprisal. This policy sets out how to raise concerns and ensures that such concerns will be taken seriously and acted upon appropriately.

The purpose of this policy is to:

- Provide a clear process for raising concerns about wrongdoing in the workplace.
- Protect individuals who report concerns in good faith under the Public Interest Disclosure Act 1998 (PIDA).
- Ensure that concerns are investigated promptly, thoroughly, and fairly.
- Promote a culture of openness and accountability within Salutem.

This policy sets out the values, principles and policies underpinning Salutem's approach to whistleblowing. Salutem defines 'whistleblowing' as the act of an employee or employees raising concerns about wrongdoing, misconduct, or unsafe practices within the organization, which can include:

- alleged, suspected or observed malpractice
- assessed, identified or perceived risks (e.g. to the safety of service users)
- unethical conduct or possible illegal acts.

Any of the above could harm, or create a risk of harm, to individuals we support, colleagues or the public.

This policy is not intended for personal grievances or complaints, which should be raised through the Salu-tem’s grievance or complaints procedures. Salu-tem recognises that “whistleblowing” is distinct from a complaint in that “whistleblowers” raise their concerns as employees. Complaints about a service are raised by people we support, others acting on their behalf or members of the public. However, it is recognised that similar procedures are followed to respond to complaints and whistleblowing.

2.Document Control

Initial purpose and scope of the new policy/procedure agreed by:	Chief Quality Officer
Technical review carried out:	Group Head of Regulatory Quality Compliance & Policy
Final quality check carried out:	Quality Assurance Inspection & Regulation Director
Date implemented:	March 2025
Version Number:	1.3
Date of the next review:	January 2027
Department responsible:	Quality
Job Title of Lead Person:	Group Head of Regulatory Quality Compliance & Policy

In addition to this policy, local authorities and other commissioners may have their own policies, procedures and guidance which Services must comply with. These policies should complement this policy. **Ensure to include your local authority/social services contact details or equivalent on your whistleblowing poster**

However, there may be additional requirements put in place by local authorities and other commissioners and these must be adhered to. Changes must not be made to Salu-tem’s policies and procedures without corporate approval but, where needed, local procedures should be developed to accompany these.

EQUALITY AND DIVERSITY STATEMENT succinct

The Salu-tem Group is committed to the fair treatment of all in line with the Equality Act 2010. An equality impact assessment has been completed on this policy to ensure that it can be implemented consistently regardless of any such factors and all will be treated with dignity and respect.

3. Contents

Item	Description	Page
1.	Summary	1
2.	Document Control	2
3.	Contents	3
4.	Definitions	4
5.	Principles	4
6.	Area of Governance	4
7.	Areas of Responsibility	5
8.	Learning and Development	5
9.	Associated Documents (including Whistleblowing Poster)	5&6
10.	Useful Links	7
11.	Version Control	7
12.	Equality Impact Assessment Tool	8

This policy must be brought to the attention of all employees.

The controlled version of this policy and its associated documents are available on the Blink Hub.
Printed or downloaded copies are uncontrolled and may not be up to date.

4. Definitions

Whistleblower

A whistleblower is a worker who reports certain types of wrongdoing, typically something they have witnessed in the workplace, though not always. The disclosed wrongdoing must be in the public interest, meaning it affects others, such as the public.

As a whistleblower, you are legally protected. You should not be treated unfairly or risk losing your job for raising concerns.

You can report a concern at any time—whether the incident occurred in the past, is happening now, or is something you believe may happen in the future.

You are protected by law if you report any of the following:

- a criminal offence, e.g. fraud
 - someone's health and safety is in danger
 - risk or actual damage to the environment
 - a miscarriage of justice
 - the company is breaking the law, e.g. doesn't have the right insurance
 - you believe someone is covering up wrongdoing
- Complaints that don't count as whistleblowing

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your case is in the public interest. Report these under Saluitem's grievance policy.

5. Principles

The key principles of whistleblowing can be summarised as follows:

- Services should foster an open and transparent culture that encourages staff to report any concerns about practices falling below acceptable standards.
- Staff members are often in the best position to identify and report poor or unsafe practices.
- Employees who raise genuine concerns about harmful practices must be taken seriously and recognised as acting in the best interest of service users and the organisation.
- Staff members must not be viewed as "troublemakers" or face any form of penalty or retaliation for reporting concerns.
- Employers must listen to and thoroughly investigate all concerns raised by staff with the same diligence as they would a complaint from a service user or their representative.

6. Areas of Governance

This policy and its associated guidance have been written with expert contribution from appropriate stakeholders. The Group Head of Regulatory Quality Compliance & Policy will monitor, reflect on and gain organisational learning from the implementation of this policy. This policy will be reviewed and updated two years from implementation unless legal changes demand a timelier amendment.

The application of this policy and its associated guidance is mandatory for all services staff, volunteers, agency staff and all other Saluitem representatives. Staff understanding of this policy and associated guidance will be assured through training, assessment of competency and supervision.

7. Areas of Responsibility

All staff members, volunteers, and contractors working with Salutem have a responsibility to report any poor or unsafe practices they encounter. Employees have a duty of care, as well as moral and legal obligations, to report any incidents where vulnerable adults or colleagues have been harmed or are at serious risk of injury or harm in the workplace.

Salutem considers that these obligations to report such incidents, which include suspected breaches of care or staff's professional codes of conduct, override any other considerations such as loyalty to colleagues.

Any member of staff who witnesses or suspects abuse by another member of staff should report the matter without delay to their supervisor or manager. The manager will accept responsibility for the actions that follow and will assure the "whistleblower" that they have acted correctly by reporting the matter, will not be victimised and their confidentiality assured unless there are overriding legal reasons for disclosing their identity.

It is recognised that there may be occasions when the staff member does not feel confident or able to report in the first instance to the manager. In these circumstances the "whistleblower" might need to take their concerns to a more senior manager or the registered person. Alternatively, you can raise a concern via the Salutem whistleblowing telephone line or email: 0844 264 2027;

whistleblowing@salutemsharedservices.co.uk

Salutem accepts the right and obligation of any staff member who thinks that their concerns are not being or might not be properly responded to or addressed, to report their concerns to an outside authority. This could be the Police, the Local Safeguarding Adults Authority or the Care Quality Commission. Each of these organisations can be expected to respond in line with their respective procedures. Again, in line with its Public Disclosure Interest Act responsibilities, Salutem will not penalise or victimise any staff member who responsibly reports their concerns in any of these ways.

8. Learning and Development

Salutem is committed to ensuring that all staff are aware of what is expected of them so that everyone is appropriately supported. Staff should speak to their line manager in relation to their learning needs using supervision and the Performance and Development Process (PDP).

9. Associated Documents

Please also refer to the following documentation via Salutem Blink Hub

- Whistleblowing Poster (and see below)
- Feedback, Complaints & Compliments Policy
- Safeguarding Policy, Procedure and Guidance
- Disciplinary Policy and Procedure
- Salutem Code of Conduct



Whistleblowing

Do you have concerns about the delivery of service in this unit?

If so, we would encourage you to report those concerns to us. We run a confidential Whistleblowing line, and you can even make your report on an anonymous basis if you prefer.

Who is a whistleblower?

- A worker who reports a certain type of wrongdoing observed at work
- The wrongdoing you report must be done in the public interest, i.e. it must affect others
- If you report as a whistleblower you are protected by law.

Who is protected by law?

A worker (e.g. an employee, including a trainee or agency worker)

What counts as whistleblowing?

You will be protected by law if you report any one of the following:

- A criminal offence (e.g. fraud)
- A concern about the Health and Safety of somebody
- A risk to, or actual damage to, the environment
- A miscarriage of justice
- A concern that the company is breaking the law (e.g. incorrect insurance)
- A belief that somebody is covering up a wrongdoing

What will not count as whistleblowing?

Personal grievances are unlikely to be covered by whistleblowing law, unless the particular case is in the public interest. Therefore bullying, harassment and discrimination are not covered by whistleblowing law and should be reported under your employer's grievance policy.

Whistleblowing is NOT the same as complaining, but if you wish to complain, you may do so using the company's Complaints Procedure.

Whistleblowing Telephone Number & Email Address

0844 264 2070 - Whistleblowing@salutemshareservices.co.uk



Tel: 03000 61 61 61

10. Useful Links

Whistleblowing Helpline for NHS and Social Care Staff:

Tel. 08000 724 725) email: enquiries@wbhelpline.org.uk

How to Contact the CQC: Tel.

03000 616161

email:enquiries@cqc.org.uk

<http://www.cqc.org.uk/content/report-concern-if-you-are-member-staff>

Care Quality Commission Leaflet Raising a Concern with CQC: available from www.cqc.org.uk

How to Contact CIW

Phone us: 0300 7900 126

Email us: CIW@gov.wales

Contact Ofsted about Concerns

Email CIE@ofsted.gov.uk

Contact Ofsted about concerns

0300 123 4666

Protect, Speak up, Stop harm: Tel. 020 3117 2520 www.protect-advice.org.uk (for advice and guidance on ways forward).

11. Version Control

This is a controlled document. As a controlled document, any printed copies of this document, or saved onto local or network drives should be actively monitored to ensure the latest version is always available.

Version Number	Date	Status	Changes
V0.1	7 Nov 2018	Draft	Update
V1.0	3 Dec 2018	Final	Completion of Document Control and addition of Equality Impact Assessment Tool
V1.1	8 Dec 2020	Reviewed	Included what falls under whistleblowing and what to do if it's a complaint
V1.2	16 th Jan 2023	Reviewed	Remove reference to QARM and some changes of ownership
V1.3	27 Feb 2025	Reviewed	Cosmetic and language updates, contact details for Protect updated

12. Equality Impact Assessment Tool

To be completed and attached to any procedural document when submitted to the appropriate committee for consideration and approval.

		Yes/No	Comments
1.	Does the document/guidance affect one group less or more favourably than another on the basis of:	No	
	• Race	No	
	• Ethnic origins (including gypsies and travellers)	No	
	• Nationality	No	
	• Gender (including gender reassignment)	No	
	• Culture	No	
	• Religion or belief	No	
	• Sexual orientation	No	
	• Age	No	
	• Disability - learning disabilities, physical disability, sensory impairment and mental health problems	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are there any valid exceptions, legal and/or justifiable?	No	
4.	Is the impact of the document/guidance likely to be negative?	No	
5.	If so, can the impact be avoided?	-	
6.	What alternative is there to achieving the document/guidance without the impact?	-	
7.	Can we reduce the impact by taking different action?	-	

If you have identified a potential discriminatory impact of this procedural document, please refer it to the author of this document, together with any suggestions as to the action required to avoid/reduce this impact. For advice in respect of answering the above questions, please contact the People Team.