Whistleblowing Policy

Introduction

This policy is primarily for concerns where the interests of others or of Jigsaw4u itself are at risk (the public interest test). If employees have a concern about their employment relationship with Jigsaw4u, this should be raised through Jigsaw4u's Grievance Procedure.

This policy applies to all employees and volunteers of Jigsaw4u.

While this policy refers to "staff" throughout, its principles are intended to apply equally to:

- Contractors working for or on behalf of Jigsaw4u
- Suppliers
- Casual and agency workers
- Volunteers
- Trustees

All groups should have access to the same support and procedures with respect to any whistleblowing concern raised.

Statement

All staff at one time or another have concerns about what is happening in the workplace. Usually, these concerns are easily resolved. However, there may be circumstances when the staff member may not know what to do where the concern is of a more serious nature.

Jigsaw4u is committed to the highest possible standards of openness, probity and accountability. We expect that our employees who have serious concerns about

anything that is happening within the organisation come forward and raise those concerns. Jigsaw4u, however, recognises that employees need to be supported and have confidence that any concerns they raise will be treated appropriately.

Purpose

The purpose of this policy is to:

- Enable staff to raise concerns at an early stage and in the right way. Jigsaw4u would rather that matters were raised when it is just a concern rather than wait for proof.
- Encourage staff and others to feel confident in raising serious concerns by providing clear channels through which those concerns can be raised.
- Reassure those who raise concerns that they will not suffer any repercussions in doing so and that they will not be subjected to any detrimental treatment as a result of raising those concerns.

The policy will ensure that all those who raise concerns receive a response and are kept informed about how their concerns are being dealt with. However, this does not necessarily mean that they will be privy to any detail in relation to the investigation into the concern raised or any specific outcomes.

Qualifying Disclosures

If the staff member makes a disclosure of information which they reasonably believe is in the public interest and that one or more of the following is either happening, has happened or is likely to happen in the future, this will be a “qualifying disclosure” and the employee will be offered protection as a whistle blower. The disclosure must relate to the following:

- A criminal offence has been committed, is being committed or is likely to be committed
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which they are subject
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health or safety of any individual has been, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Information indicating any matter falling within any one of the above has been, is being or is likely to be deliberately concealed

Within Jigsaw4u, this can include:

- A misuse of charitable funds and/or financial malpractice

- Safeguarding concerns with respect to children/young people or any action that negatively affects the welfare of children/young people (see Appendix 1)
- An unauthorised disclosure of confidential information
- Any conduct likely to damage Jigsaw4u's reputation

Safeguards for Those Raising a Concern

Staff may be worried about raising such issues or may want to keep the concerns to themselves, perhaps feeling it is none of their business or that it is only a suspicion. They may feel that raising the matter would be disloyal to colleagues, managers or to Jigsaw4u. They may decide to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next. They may also fear harassment or victimisation.

Support to those raising concerns

Jigsaw4u is committed to good practice and high standards and will be supportive of staff raising genuine concerns.

Jigsaw4u recognises that the decision to report a concern can be a difficult one to make. Where the staff member raises a genuine concern under this policy, they should have nothing to fear as they will be considered as discharging their duty to Jigsaw4u.

An investigation into concerns raised under this policy will not influence or be influenced by any formal procedures (e.g. disciplinary or redundancy) that the staff member may already be subject to.

Harassment or victimisation

Jigsaw4u will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the staff member who raises a concern which they reasonably believe to be in the public interest.

Anonymous allegations

The whistle blower should, whenever possible, put their name to the allegation, as concerns expressed anonymously may be less likely to result in effectively dealing with the concerns raised. Anonymous allegations will be considered at the discretion of Jigsaw4u and will largely depend upon whether the issue raised is sufficiently serious. In exercising our discretion, the factors likely to be taken into account by Jigsaw4u can include:

- Whether the concern involves safeguarding and/or child protection issues
- Whether the concern involves individual or public safety
- Whether the concern involves corruption, waste or other impropriety
- The credibility of the concern

- Whether there is a likelihood of confirming the allegation from other sources

Confidentiality

All concerns will be treated in confidence, and all reasonable efforts will be made to avoid revealing the staff member's (whistle blower's) identity if requested by them.

It may not be possible to keep a staff member's identity confidential whilst carrying out a thorough investigation and they may need to be identified as a witness at an appropriate time. If it becomes necessary to reveal the staff member's identity, they will be informed in writing and of the reasons why it is necessary to identify them.

Untrue or Malicious Allegations

If a staff member makes a disclosure which they reasonably believe to be in the public interest, which is not confirmed by the investigation, no action will be taken against them. The outcome will be notified to the employee. Jigsaw4u will deem the matter to be concluded and that it should not be raised again unless new evidence comes to light.

If, however, a staff member makes an allegation frivolously, maliciously, vexatiously or for personal gain, disciplinary procedures will apply.

How to Raise a Concern

It is normally expected that concerns will, in the first instance, be raised internally with the immediate Line Manager, Member of Senior Leadership Team or Chief Executive Officer. Internal processes must be considered before reporting the concern to an external prescribed person or body (see below under External Contacts).

In relation to child protection and/or safeguarding matters, concerns should initially be made with Jigsaw4u's Designated Safeguarding Lead or deputy in their absence.

Concerns may be raised verbally or in writing. If the staff member wishes to make a written report it is suggested that they include the background and history of the concern with relevant dates and the reason why they are particularly concerned about the situation.

Concerns regarding the Chief Executive Officer should be directed to the Chair of Trustees, via the following means.

Email: chairoftrustees@jigsaw4u.org.uk
Letter: FAO Chair of Trustees, Jigsaw4u, 40 Mill Green Road, Mitcham CR4 4HY

In order to engage the protection under this policy, the staff member will need to demonstrate that:

- There are reasonable grounds for their concern
- That the disclosure is made in the public interest
- That the disclosure relates to any one of the specified grounds as referred to above

The staff member may be accompanied by a representative or a work colleague at any meeting/interview in connection with the concerns they have raised. Any companion must respect the confidentiality of the disclosure and any subsequent investigation.

External Contacts

The primary aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases the staff member should not find it necessary to alert anyone externally. However, Jigsaw4u recognises that in some circumstances the staff member may not feel able to disclose a matter internally or that it may be more appropriate for them to report their concerns to an external body because, for example:

- The matter is of an extremely sensitive or serious nature, or
- The staff member believes management or trustees to be involved, or
- The staff member believes Jigsaw4u will cover it up, or
- The staff member believes Jigsaw4u will treat them unfairly if they complain, or
- Where the staff member has raised the matter previously, but the concern has not been dealt with

Staff are strongly encouraged to seek advice before reporting a concern to anyone external. Advice can be sought from ACAS, NCVO or Citizens Advice.

Jigsaw4u should stress to staff that if they choose to take a concern outside the organisation, it is their responsibility to ensure that confidential information, in whatever format, is not disclosed to a third party.

Where a disclosure to an external body is justified and/or necessary, in those circumstances the staff member can properly report matters to the following agencies, depending on the nature of the issue:

- The Local Authority Director of Children's Services
- The Local Authority Designated Officer (LADO)
- Prescribed Person or Body, for example:
    - Protect, an independent charity that provides confidential advice on whistleblowing issues: 020 3117 2520 or https://protect-advice.org.uk/

- Children's Commissioner for England: 020 7783 8330 or https://www.childrenscommissioner.gov.uk/about-us/contact/
- NSPCC: 020 7825 2505 or https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/
- Charity Commission: 0845 3000 218 or https://forms.charitycommission.gov.uk/raising-concerns/
- Fundraising Regulator: 0300 999 3407 or https://www.fundraisingregulator.org.uk/service/complaints-and-investigations
- Information Commissioner's Office: 0303 123 1113 or https://ico.org.uk/make-a-complaint/

As a last resort, and provided it is appropriate in all the circumstances, the staff member may choose to raise their concern externally to someone other than the prescribed persons/bodies, for example:

- The Police
- A Member of Parliament (MP)

It will very rarely, if ever, be appropriate to alert the media. This also carries a risk of disclosing confidential information to unauthorised third parties. If the staff member approaches the media, they can expect in most cases to lose their whistleblowing law rights and protection.

How Jigsaw4u Will Respond

Once the staff member has raised a concern, it will be considered by Jigsaw4u initially to assess whether this policy is engaged or whether the concern better falls under any other policy or procedure, for example, Jigsaw4u's disciplinary or grievance procedures.

Matters raised may also:

- Be referred to the Police
- Be referred to the Local Authority
- Form the subject matter of an independent investigation

In deciding how to deal with the concern raised, the key considerations which Jigsaw4u will have in mind are the public interest, service users and staff.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

If an investigation is required, Jigsaw4u will appoint an Investigating Officer. Within 10 working days of a concern being raised, the Investigating Officer will write to the

staff member confirming how they propose to investigate the concern and the timescale for providing a final response. If there is an ongoing investigation the person responsible for that investigation will, if considered appropriate, provide the staff member with updates on how the matter is progressing but as described elsewhere in this policy, the staff member will not be privy to details of the investigation or any specific outcomes.

Jigsaw4u will take steps to minimise any difficulties, which the staff member may experience as a result of raising a concern. For instance, if they are required to give evidence in criminal or disciplinary proceedings, Jigsaw4u will arrange for them to receive advice about the procedure and any support and counselling available to them.

The Responsible Officer

The Chief Executive Officer has overall responsibility for the maintenance and operation of this policy.

The Chief Executive Officer will maintain a register of concerns raised, the nature of the concerns and the outcomes, in a form that preserves confidentiality.

In cases where concerns are related to the Chief Executive Officer, the Chair of Trustees will assume responsibility for the maintenance and operation of this policy.

The Register will be maintained in accordance with the provisions of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Whistleblowing and Safeguarding

Safeguarding children and young people at risk requires everyone to be committed to the highest possible standards of openness, integrity and accountability. Jigsaw4u is committed to encouraging and maintaining a culture where staff feel able to raise a genuine safeguarding concern and are confident that it will be taken seriously.

In the context of safeguarding, “whistleblowing” is when someone raises a concern about the wellbeing of a child at risk. This whistleblowing policy therefore has a key role to play in safeguarding children and young people.

When raising a safeguarding concern, the following policies may be relevant:

- Jigsaw4u Safeguarding Policy
- Jigsaw4u Code of Conduct
- Working Together to Safeguard Children (2026) DfE Guidance [or latest version]

- London Child Protection Procedures and Practice Guidance (7th Edition) [or latest edition]

It is the clear responsibility of all to act on any concerns or information that gives them concern about the safety and wellbeing of a child or children/young people within Jigsaw4u, within the care of Jigsaw4u or arising from circumstances or events out of Jigsaw4u. Such a concern in a whistleblowing context may be related to:

- Conduct or behaviour of a staff member towards an individual child or children that causes concern
- Information that suggests a staff member is unsuitable to work with children/young people
- A belief that the Designated Safeguarding Lead, Senior Leadership Team or Trustees have failed to take appropriate action in response to safeguarding concerns raised

This policy outlines to whom those concerns may be reported. In dealing with concerns around safeguarding/child protection matters in particular, the London Child Protection Procedures and Practice Guidance state that if a member of staff believes that a reported allegation is not being dealt with appropriately by their organisation, they should report the matter to their Local Authority's Multi Agency Safeguarding Hub (MASH) or Local Authority Designated Officer (LADO).

This policy has been approved and authorised by:

Signed: Emanuele Bormida
Date: 07/09/2026
Name: **Emanuele Bormida** (Chair, Board of Trustees)

Signed: 
Date: 07/09/2026
Name: **Josh Dearden-Howell** (Acting Chief Executive Officer)

Policy prepared by: Josh Dearden-Howell
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