



BCC Whistleblowing Policy, May 2026

Purpose

Boleskine Community Care (BCC) is committed to creating and maintaining a safe, open and transparent workplace culture, where employees are encouraged to raise concerns about suspected misconduct at the earliest opportunity. We recognise the negative effect which malpractice would have on BCC, and therefore encourage early notification of genuine concerns, or any suspicions concerning misconduct or malpractice.

This policy applies to all staff including temporary, casual and agency staff, work experience, trainees and apprentices. This policy aims to enable and encourage staff to raise concerns within BCC and that they are investigated in a timely and effective manner. Employees will be listened to and serious concerns will be investigated. It recognises a worker's legal rights to make a protected disclosure to certain prescribed persons or bodies under the Public Interest Disclosure Act 1998 and any subsequent legislation, as incorporated into the Employment Rights Act 1996.

This Policy is intended to cover concerns that are made in the public interest. If the matter is of an individual or personal nature it should be pursued through BCC's management and HR processes. Complaints relating to discrimination, victimisation or harassment should also be dealt with through HR and Grievance Procedures.

This Policy applies to employees, volunteers and contractors.

What is covered under this policy?

A disclosure can be made under this Policy about genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:

- Criminal activity;
- Miscarriages of justice;
- Practices endangering health and safety;
- Practices damaging the environment;
- Failure to comply with a legal obligation;
- Bribery;
- Financial malpractice, impropriety or fraud;

- Serious failure to comply with any codes of practice or ethical rules covering the business including, but not limited to, safeguarding and protection of vulnerable groups;
- Attempts to conceal any of the above.

How to raise a concern?

A concern should be raised in the first instance to a line manager or the Chair of the Trustee Board. If the concern relates to the Chair of the Trustee Board, the concern should be raised with another member of the Trustee Board or directly with OSCR (see details below).

Whether a written or verbal report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.
- If a report is made verbally, the whistleblower will be asked to confirm a written record of the allegation to ensure details have been recorded accurately before an investigation proceeds.

Confidentiality and Anonymity

Any disclosure made under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance because of the nature of the information, this will be explained to the complainant. However, there may be some legal or safeguarding procedures which require disclosure and where the whistleblower's name and details cannot remain confidential.

Concerns expressed anonymously will be investigated subject to sufficient information being provided but they cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate, and feedback cannot be provided to the whistleblower.

Support for individuals through a disclosure

BCC appreciates that those reporting concerns may be apprehensive and wish to reassure whistle-blowers that they will suffer no detrimental treatment as a result of voicing concerns.

BCC will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour should be directed to the Chair of the Trustee Board. If a member of staff thinks

they have or may suffer detrimental treatment as a result of raising a concern, they should contact the Chair of the Trustee Board or OSCR.

No action will be taken against complainants for raising genuine concerns even if the concern raised is not substantiated by any subsequent investigation.

Disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest), or who intentionally misleads BCC in respect of any matter.

Investigation

Once a concern has been raised, BCC will investigate the allegations. An initial acknowledgement will be sent to the whistleblower within 5 working days and at this point an indication will be given of expected time frames. The whistleblower will be asked to attend a meeting as part of this investigation and has a right to be accompanied to this meeting. An external investigator may be used depending on the circumstances.

The whistleblower will be kept informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply.

Whistleblowers will be provided with details of the outcome but will not be given details of any disciplinary action against an individual or individuals unless, in exceptional circumstances, BCC considers this appropriate.

Record keeping

BCC will keep a confidential record of any and all disclosures under this policy.

Dissatisfaction with the Outcome

If the whistleblower is dissatisfied with the outcome of the investigation, they should raise this with the Chair of the Trustees (chair@boleskinecc.com), giving the reasons for their dissatisfaction. The Chair will respond in writing advising of acceptance or rejection of the need for further investigation and the reasons for this.

Alternatively, the whistleblower should report their concerns to an external body.

Reporting a concern to an external body

This policy is intended to provide a route by which members of staff can raise concerns internally. However, if an employee is unhappy with the outcome of an investigation or if, for any reason they do not feel comfortable raising their concern internally, they are free to take the

matter outside of the organisation to a prescribed person or body or to their Member of Parliament (MP).

Prescribed bodies for BCC's purposes include but are not limited to:

- The Care Quality Commission (CQC):
<https://www.cqc.org.uk/contact-us/report-concern/report-concern-if-you-are-member-public>
- OSCR, the Scottish Charity Regulator:
<https://www.oscr.org.uk/raise-a-concern/whistleblowing/>

Version control

Version number	Prepared by	Date approved by Trustees
1.0	Rachel Burn	12th May 2026