



Salutem Whistleblowing Policy

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

1. Summary

At Salutem Care and Education, we are committed to the highest standards of transparency, integrity, and accountability in all aspects of its operations. We recognise that staff, volunteers, and external stakeholders may be the first to identify concerns about poor practice, misconduct, or risks to safety.

This policy provides a clear framework for raising such concerns confidentially and without fear of retaliation. Whistleblowing helps protect the people we support, strengthens our culture, and ensures legal and regulatory compliance.

This policy applies to:

- All employees (permanent, temporary, bank and agency)
- Contractors and self-employed professionals
- Volunteers and students
- Governors, trustees and board members
- External stakeholders (e.g., family members, advocates, social workers, commissioning teams and local safeguarding authorities)

It applies across all our settings, including children's residential care, supported living, adult care, and educational settings (e.g. schools, colleges, or training centres).

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 Saludem.

Who Can Raise a Concern? This policy is primarily intended for workers (including employees, agency staff, contractors, and volunteers). However, we recognise that concerns may also be raised by external individuals, such as:

- Parents, carers or guardians
- Social workers, commissioners, and other professionals
- Suppliers or contractors
- Members of the public

Regulatory Expectations: UK regulators such as the Care Quality Commission (CQC), Ofsted, Estyn and CIW are clear that organisations should have accessible channels for whistleblowing and respond appropriately to all concerns, not just those raised by employees.

This policy is not intended for personal grievances or complaints, which should be raised through the Saludem's grievance or complaints procedures. Saludem recognises that "whistleblowing" is distinct from a complaint in that "whistleblowers" raise their concerns as employees' members of the public? Complaints about a location 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:	V1.3
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 Salutem's policies and procedures without corporate approval but, where needed, local procedures should be developed to accompany these.

EQUALITY AND DIVERSITY STATEMENT

The Salutem 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.

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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

Whistleblowing is the disclosure of information about suspected wrongdoing, malpractice, or risks that are in the public interest.

As a whistleblower, you are legally protected. You should not be treated unfairly or risk losing your job for raising concerns. Whistleblowers are protected by The Public Interest Disclosure Act (PIDA) 1998, which protects workers from retaliation when they disclose certain types of wrongdoing, such as:

This may include:

- Safeguarding concerns (neglect, abuse, exploitation)
- Unsafe care or educational practices
- Breaches of health and safety
- Criminal offences (e.g., fraud, theft, abuse)
- Misuse of company funds or resources
- Discrimination, bullying or harassment
- Environmental damage.
- Health and safety risks.
- Fraud or financial misconduct.
- Any other misconduct in the public interest.
- Failure to comply with legal or regulatory obligations
- Covering up wrongdoing

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

Whistleblowing does **not** include:

- Personal grievances (e.g., bullying or harassment of the whistleblower) – these should be raised through the Grievance Procedure.
- Complaints made by people using the service or their representatives – these should be raised through the Complaints Policy.

5. Principles

The **principles** of a Whistleblowing Policy form the ethical and operational foundation of how whistleblowing is handled. These principles ensure that concerns about wrongdoing are raised and managed in a way that protects individuals and promotes accountability.

The **core principles** of Salutem's Whistleblowing Policy:

Protection of the Public Interest: Whistleblowing is about raising concerns that affect the welfare of others—particularly vulnerable children or adults in care and education settings. The policy is grounded in the duty to protect those at risk.

Commitment to a Safe and Transparent Culture: The organisation promotes a culture where staff, volunteers, and external stakeholders feel safe to speak up without fear. Transparency is actively encouraged at all levels.

No Retaliation or Victimisation: Individuals who raise concerns in good faith will not be penalised or suffer any detriment. Salutem ensures protection under the **Public Interest Disclosure Act 1998 (PIDA)** or equivalent safeguarding frameworks.

Confidentiality: Concerns raised will be handled with sensitivity. The identity of the whistleblower will be kept confidential wherever possible, unless legally required to disclose.

Accessibility and Inclusivity: Anyone who has a legitimate concern should feel able to raise it. The policy is accessible to:

- Employees and volunteers
- Contractors and agency workers
- Families, professionals, and external stakeholders

The organisation ensures procedures are easy to understand and use.

Fair and Timely Investigation: All disclosures will be taken seriously and investigated appropriately. The process will be fair, unbiased, and completed within a reasonable timeframe.

Acting on Concerns: The organisation is committed to acting on concerns where wrongdoing, poor practice, or risks are found. Appropriate measures will be taken to correct and prevent further harm.

Accountability and Learning: The organisation reviews whistleblowing activity to identify patterns, trends, and learning opportunities. Outcomes feed into continuous improvement and quality assurance.

Compliance with Legal and Regulatory Standards: The policy aligns with legal duties under PIDA, safeguarding regulations, and requirements set out by regulators such as:

- Care Quality Commission (CQC)
- Ofsted
- CIW
- Estyn
- Local Safeguarding Partnerships

How to Raise a Concern: You can raise a whistleblowing concern through the following channels:

Internally:

- Line Manager: If appropriate, raise the concern with your immediate manager.
- Designated Whistleblowing Hotline: 0844 264 2070 whistleblowing@salutemsharedservices.co.uk
- Senior Management or Director: If you feel unable to raise it at a lower level, you may escalate to a senior leader.
- Quality Assurance

Externally (if internal reporting is not appropriate):

- Care Quality Commission (CQC) – for concerns about adult or children’s care services
<https://www.cqc.org.uk/guidance-providers/whistleblowing>
- Ofsted – for concerns about children’s homes or education
<https://www.gov.uk/guidance/whistleblowing-about-childrens-social-care-services>
- Local Authority Safeguarding Teams
- Protect (formerly Public Concern at Work) – independent whistleblowing advice
<https://protect-advice.org.uk/>

Anonymity: You may raise concerns anonymously. However, this can make investigation more difficult. We encourage you to identify yourself where possible, and we will protect your confidentiality throughout the process.

Investigations and Outcomes

- All concerns will be assessed and, where necessary, investigated promptly and fairly.
- You will be informed of the outcome, subject to confidentiality and legal constraints.
- Appropriate action will be taken to address any wrongdoing or risk identified.

Protection from Victimisation: It is unlawful to victimise or dismiss someone for raising a protected disclosure under PIDA. Any such conduct will be treated as a disciplinary offence.

If you believe you are being treated unfairly because you raised a concern, you should report this to [Designated Whistleblowing Officer or HR].

Malicious Allegations: Whistleblowing must be done in good faith. Deliberately false or malicious allegations may result in disciplinary action.

6. Areas of Governance

This policy and its associated 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.

Safeguarding (Children and Adults): Ensuring all concerns about abuse, neglect, or exploitation are raised and acted upon. Supports compliance with the Children Act 1989/2004, Care Act 2014, and Working Together to Safeguard Children.

Regulatory Compliance

- Meeting legal duties under:
- Public Interest Disclosure Act 1998 (PIDA)
- Health and Social Care Act 2008
- Education and Skills Act 2008
- Supporting regulatory inspections by CQC, Ofsted, and local authorities.

Risk Management and Quality Assurance: Identifying systemic risks (e.g., unsafe practices, policy breaches).

- Gatekeepers to the Whistleblowing Tracker
- Reporting to SLT
- Feeding into serious incident reviews and internal audits.

Organisational Culture and Ethics:

- Promoting a transparent, open, and just culture where staff and stakeholders feel safe to raise concerns.
- Preventing cultures of silence, fear, or blame.

HR and Workforce Management

- Ensuring fair treatment of whistleblowers.
- Protecting employees from victimisation.
- Informing disciplinary or grievance procedures when misconduct is identified.

Board Oversight and Accountability:

- The Board or Trustees must be assured that whistleblowing mechanisms are effective.
- Regular reporting on whistleblowing cases and themes should inform governance meetings and decision-making.

External Engagement and Stakeholder Relations:

- Allowing families, professionals, and external partners to raise concerns safely.
- Maintaining public confidence and reputation.

The application of this policy and its associated guidance is mandatory for all staff, volunteers, agency staff and all other Salutem 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 (Including Volunteers and Agency Workers): Responsibility to:

- Raise concerns promptly if they witness or suspect wrongdoing.
- Act in good faith and avoid malicious allegations.
- Cooperate with any whistleblowing investigations.
- Maintain confidentiality of sensitive information.

Line Managers / Supervisors: Responsibility to:

- Listen to concerns raised by staff or others in a respectful and supportive manner.
- Report disclosures to the Quality Assurance and Regulations Director and Group Head of Regulations.
- Avoid victimisation or unfair treatment of the whistleblower.
- Support staff through the process and signpost them to further help.

Designated Whistleblowing Officer (or Safeguarding Lead / HR): Responsibility to:

- Receive and record whistleblowing disclosures.
- Assess the nature of the concern and initiate investigations or referrals.
- Maintain confidentiality and whistleblower protection.
- Ensure the whistleblower receives appropriate feedback and support.

Senior Management Team: Responsibility to:

- Ensure a culture of openness and non-retaliation is upheld.
- Monitor and review trends or patterns in whistleblowing disclosures.
- Provide staff with training and clear guidance on raising concerns.
- Escalate significant risks to the Board or Trustees.

HR / People Services Team: Responsibility to:

- Advise on the application of employment law and whistleblower protections.
- Support any investigations with advice on conduct, confidentiality, and due process.
- Act on findings appropriately, including disciplinary measures if necessary.

Board of Trustees / Governing Body: Responsibility to:

- Oversee the whistleblowing framework and ensure it is effective.
- Receive regular reports (in anonymised form) on disclosures and outcomes.
- Ensure leadership maintains a culture of transparency and accountability.
- Commission independent reviews if needed for serious or high-risk concerns.

External Stakeholders (Families, Professionals, Contractors): Responsibility to:

- Raise genuine concerns about safety, welfare, or malpractice.
- Use the appropriate reporting channels provided by the organisation.

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
- Grievance Policy
- 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.