Thread Ahead Whistleblowing Policy

Date last reviewed: 8th May 2026

Date next review due: 8th May 2028

Policy

This policy applies to employees, volunteers, trustees, freelancers, contractors, interns and agency workers.

It is important that any fraud, misconduct or wrongdoing by any of the aforementioned people is reported and properly dealt with. Concerns relating to safeguarding may also be raised under this procedure, in addition to the Safeguarding Policy and reporting procedures.

We require all individuals to raise any concerns that they may have about the conduct of others in Thread Ahead or the way in which the organisation is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

Background

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters in the public interest. These are called 'qualifying disclosures'. A qualifying disclosure is one made by an employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- or concealment of any of the above

is being, has been, or is likely to be, committed.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be committed – a reasonable belief is sufficient. You have no responsibility

for investigating the matter – it is Thread Ahead's responsibility to ensure that an investigation takes place.

If you make a protected disclosure, you have the right not to be dismissed or subjected to any other disciplinary process because you have made a disclosure. We encourage you to raise your concerns under this procedure in the first instance.

Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of Thread Ahead should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly and promptly, and the outcome of the investigation reported back to the person who raised the issue. We will seek to keep disclosures confidential where possible. However, it may not always be possible to guarantee anonymity if this limits a fair investigation or is required by law.
- No employee or other person working on behalf of Thread Ahead will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.
- Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.
- Maliciously making a false allegation is a disciplinary offence. If you raise a concern honestly and in the reasonable belief that it is in the public interest, you will not be penalised even if the concern is ultimately unfounded.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to the CEO or the Chair of the Board of Trustees.

Procedure

This procedure is for disclosures about matters other than a breach of your own contract of employment. Matters relating to your contract of employment should be raised via the grievance procedure.

Stage 1: In the first instance, concerns can be raised with the CEO, Chair of Trustees, or another appropriate senior person. Contact details can be found below. They will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above.

Your statement will be taken into account and you will be asked to comment on any additional evidence obtained. The CEO will take any necessary action, including reporting the matter to the Chair of the Board of Trustees and any appropriate government department or regulatory agency. The CEO will also invoke any disciplinary action required. On conclusion of any investigation, you will be told the outcome and what Thread Ahead has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

Stage 2: You should escalate the matter to the Chair of the Board of Trustees if you are concerned that the CEO:

- is involved in the wrongdoing
- has failed to make a proper investigation
- or has failed to report the outcome of the investigations to the relevant person

The Chair will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the Board.

Stage 3: If on conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. This includes:

- HM Revenue & Customs
- The Health and Safety Executive
- The Environment Agency
- The Serious Fraud Office
- The Charity Commission
- The Pensions Regulator
- The Information Commissioner
- The Financial Conduct Authority
- The Competition and Markets Authority
- The Independent Office for Police Conduct

You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014 (PDF).

Contact Details

CEO & Designated Safeguarding Lead:

Name: Saskia Borchardt-Hume

Email: saskia@threadahead.org

Chair of Trustees:

Name: Daniel Adeyemi

Email: daniel@threadahead.org

Data Protection

When an individual makes a disclosure, we will process any personal data collected in accordance with our Data Protection Policy. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

Review of Policy

This policy will be reviewed every two years by the CEO and the Board of Trustees, or sooner where required by changes in legislation, regulation or organisational practice.