



## Chrysalis Group & Subsidiaries

Chrysalis Group Services  
Touchstone Developments & Investments Ltd  
Chrysalis Supported Housing  
Opoka CIO  
Compass Project CIC  
Journey Care Services Ltd  
Blackfields Furniture Ltd

## **Whistleblowing Policy**

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Within the Chrysalis Group there is a Charitable Incorporated Organisation supporting Polish women and children escaping domestic abuse, a Registered Social Housing Landlord that delivers supported housing to vulnerable people, a Charitable Incorporated Company supporting those recovering from addiction including counselling and training, a limited company providing treatment under CQC regulation and other commercial companies offering internal and external related services. It is therefore essential that the Governance Framework used within the Group is fit for all the entities and their stakeholders, recognising the regulatory requirements of each organisation within the group. It is also essential that as service users may access services of more than one organisation within the group, policies and procedures are consistently applied across the group, staff are trained using the same guidelines and proper information sharing protocols are in place. For this reason, governance based policies are group wide but apply to all entities within the group to meet our mission:

*To safeguard and promote the wellbeing of our service users and communities across the UK, providing high quality, good value, sustainable services and homes, demonstrating that commercial opportunity and activities through the group can underpin our commitment to deliver for social good.*

## **1. Purpose**

- 1.1 This Policy covers Chrysalis Group and all its subsidiaries.
- 1.2 Chrysalis Group is committed to the highest possible standards of openness, probity, transparency and accountability. All Employees, Board members and Contractors across the group will conduct themselves with integrity, trust and fairness.
- 1.3 This policy has been produced in accordance with the Public Interest Disclosure Act 1998 (PIDA), which protects colleagues and workers making disclosures about certain matters of concern (where those disclosures are made in accordance with the provisions of the Act) from dismissal or a detriment short of dismissal.
- 1.4 The policy is intended to encourage and enable Board members, staff and contractors to raise serious concerns within Chrysalis Group rather than overlooking a problem or feeling they need to report the concern externally.
- 1.5 It sets out Chrysalis Group's approach to dealing with concerns raised by staff, Board members and Contractors about any aspect of our work.
- 1.6 A *whistleblower* is a person who raises a concern about a wrongdoing occurring in an organisation. Whistleblowing occurs when a member of staff and/or Board member or Contractor raises serious concerns and/or provides certain types of information, usually to the employer or a regulator which has come to their attention through work.

## **2. Legal and Regulatory responsibilities (not exhaustive)**

- Public Interest Disclosure Act 1998 and 2013 Guidance
- Data Protection Act 1998
- General Data Protection Regulation (GDPR)

### **3. Scope**

- 3.1 This policy applies to all Board members, employees and Contractors operating within and for Chrysalis Group.
- 3.2 There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. The Whistleblowing policy is intended to cover major concerns that fall outside the scope of other procedures.

### **4. Policy statement**

- 4.1 Chrysalis Group will listen to all concerns, investigate further if necessary and protect individuals against reprisals, bullying or victimisation for speaking out.
- 4.2 At Chrysalis Group, openness and accountability inform everything we do. From time to time however, individuals may have concerns about performance, working practices, actions we propose to take or actions we have already taken.
- 4.3 Concerns raised may be about:
  - theft, fraud, corruption or malpractice;
  - actual or potential criminal offences;
  - failure to comply with a legal obligation – such as those relating to health & safety;
  - failure to deliver proper standards of service;
  - denial of a service due to discrimination of any sort
  - damaging personal conflicts at senior level;
  - the sexual physical or psychological abuse of clients;
  - bullying, harassment, discrimination or victimisation in the workplace;
  - failure to abide by Chrysalis Group’s policies and procedures;
  - conflicts arising between personal interests and those of Chrysalis Group;
  - improper use of Chrysalis Group funds or personal monies belonging to service users;
  - damage to the environment; or
  - anything else relating to unethical conduct
- 4.4 If the concern can’t be addressed using the disciplinary, grievance or other processes, then individuals can use this Whistleblowing (Confidential Reporting) Policy to express their concern confidentially.
- 4.5 Chrysalis Group will:
  - investigate all legitimate concerns;
  - pursue fraud and serious abuse via our disciplinary procedures or through the courts if necessary; and
  - report all thefts and fraud to the Police.
  - remain committed to supporting colleagues who raise legitimate concerns;
  - treat it as disciplinary offence if any colleague discourages another from coming forward to express a concern;

- deal severely with anyone who criticises, bullies, harasses or victimises an individual after a concern has been raised.

## **5. Responsibilities**

- 5.1 All Board members, Employees and Contractors are required to promptly report any issue of concern regarding any aspect of Chrysalis Group's business activities. In the majority of cases, this will be done through the usual board and management arrangements.
- 5.2 To use the confidential reporting process, an individual is not required to 'prove' the truth of any allegation, but will be expected to demonstrate that there are reasonable grounds for the concern. They will also be expected to co-operate with any investigation that takes place.

## **6. How to Raise Concerns**

- 6.1 Concerns should normally be raised in writing and forwarded to the Group Company Secretary or for Chrysalis Supported Association the Managing Director. This may, however, depend on the seriousness and sensitivity of the issues involved and who is thought to be involved in the alleged wrongdoing or malpractice. If the matter concerns that Director, then the whistle-blower may forward details of the concerns to the Chair of the Board for Chrysalis Supported Association or the group Chair for other companies within the group.
- 6.2 Concerns should be raised in writing without undue delay setting out the background and history of the concern, giving names, dates and places where possible, and the reason for the individual's concern.

## **7. How Chrysalis Group will respond**

- 7.1 The action taken by Chrysalis Group will depend on the nature of the concern. The matters raised may:
  - be investigated by management, internal audit, or through the disciplinary/grievance process
  - be referred to the police
  - be referred to the external auditor
  - form the subject of an independent inquiry
- 7.2 In order to protect individuals and Chrysalis Group, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.
- 7.3 Concerns or allegations which fall within the scope of specific procedures (for example discrimination issues) will normally be referred for consideration under those procedures. Some concerns may be resolved by agreed action within the need for investigation.
- 7.4 If urgent action is required this will be taken before any investigation is conducted. The amount of contact between the individual investigating/considering the issues

and the complainant will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided.

- 7.5 Within 10 working days of a concern being received, the Group Company Secretary or Managing Director will write to the whistleblower:
- acknowledging that the concern has been received;
  - indicating how he/she proposes to deal with the matter;
  - giving an estimate of how long it will take to provide a final response;
  - informing whether any initial enquiries have been made, and what further investigations will take place, if any
- 7.6 Chrysalis Group will take steps to minimise any difficulties which the whistleblower may experience as a result of raising a concern. For instance, if it becomes necessary to give evidence in criminal or disciplinary proceedings, Chrysalis Group will provide the necessary advice about the procedure and give whatever practical support that is possible. Where possible whistleblowers will receive feedback about the outcomes of any investigations.

## **8. Taking the Concerns Externally**

- 8.1 This policy is intended to provide individuals with an avenue to raise concerns within Chrysalis Group. There may be circumstances where a whistleblower considers it necessary to raise the matter externally. This may be because, for example, there is a need to involve the appropriate external regulatory body, or where the complainant considers that the matter has not been properly addressed, or believes it will be covered up.
- 8.2 If an individual believes that such a course of action is necessary, the following are possible contact points:
- Relevant professional bodies or regulator, e.g. RSH
  - Trade union
  - Solicitor
  - Police
- 8.3 If an individual is unsure whether or how to raise a concern or wants confidential advice, contact can be made with the independent charity *Public Concern at Work* (a whistleblowing charity) on 020 7404 6609 or at [helpline@pcaw.co.uk](mailto:helpline@pcaw.co.uk). Their lawyers can provide free confidential advice on how to raise a concern about serious malpractice at work.

## **9. Policy Monitoring and Review**

- 9.1 The Group Company Secretary has overall responsibility for the operation of this Policy. A record of all concerns raised, and the outcomes will be maintained. The Company Secretary will report to the Board at least annually on the operation of the Policy.
- 9.2 This policy will be reviewed every two years.

