

CPT Whistleblowing Policy

1. Definition

'Whistleblowing' is officially defined as making a disclosure that is in the public interest.

2. Policy Statement

CPT is committed to fairness, transparency and good governance and sees all members actively contributing to that. One implication of that is identifying and addressing wrong-doing. CPT therefore encourages all of its members to raise any serious concerns about CPT's work or the actions of CPT's members without fear of harassment or victimisation.

The legal framework which this policy operates under is The Public Interest Disclosure Act 1998.

CPT has a Complaints policy which allows members to lodge a grievance about their membership. This Whistleblowing policy is intended to cover any serious concerns that members may have which fall outside the scope of the Complaints policy and other policies.

3. Concerns which could lead to action under whistleblowing

Concerns include the following but the list is not exhaustive:

- Conduct which is an offence or a breach of law
- Failure to comply with a legal obligation
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public as well as other members
- Damage to the environment
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical or other abuse of clients
- Other unethical conduct

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- Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong
- A miscarriage of justice
- Failure to meet a legal obligation

or deliberate concealment of any of the above.

CPT will treat all concerns in confidence and will make every effort to protect an individual's identity and well-being when raising a concern. However the investigation process may well reveal the identity of the source or the whistleblower may need to be called as a witness to the investigation. Allegations expressed anonymously are often less powerful but they will be considered at the discretion of CPT.

Factors to be taken into account will include:-

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources.

It should be noted that members must:

- disclose the information in good faith
- believe it to be substantially true
- **not** act maliciously or make false allegations
- **not** seek any personal gain.

4. Victimisation

CPT will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect whistleblowers when a concern is raised in good faith.

5. Raising a concern

CPT members are encouraged to raise any concern with the following persons in order of preference: Chair of the Management Committee, Chair of the Board of Trustees. However if the member believes that any of these persons are implicated in the concern, they should raise their concern with another Trustee.

Concerns should put in writing, giving details as appropriate.

6. CPT responses

Within 10 days of receipt of a concern, CPT will confirm in writing that the concern has been received. CPT will inform the member whether further investigations will take place and, if not, the reasons why. Some concerns may be resolved without need for further investigation.

The initial enquiry will be carried out by the Chair of the Management Committee. If further formal investigation is needed, this will be led by the Chair of the Board of Trustees. When a meeting is arranged, members have the right to be accompanied by a representative or friend who is not involved in the concern.

Where relevant, CPT will involve other bodies, such as the police, working to ensure that issues, and especially any illegalities, are addressed thoroughly.

CPT accepts that members need to be reassured that the concern raised has been properly addressed. Subject to legal constraints, the member raising the concern will receive information about the outcomes of any investigations.

If any member raises a concern in good faith which is subsequently not confirmed by an investigation, no action will be taken against them. However, if members make malicious or vexatious allegations, appropriate action may be considered and implemented.