

# Policy

## Whistleblowing Policy

<b>Key Facts</b>
<ul style="list-style-type: none"><li>• This policy applies to all workers, officers, consultants, self-employed contractors, Macmillan Professionals, casual workers, agency workers, volunteers and interns. Refer to this policy when you are concerned about and action (or inaction) by Macmillan or its representatives (see above)</li></ul>
<ul style="list-style-type: none"><li>• Summary: This policy covers what to do when you are concerned something dangerous, unethical, or illegal is happening within Macmillan, and how to report it, including how to do this confidentially.</li></ul>

<b>Policy Title</b>	Whistleblowing Policy	<b>Document Classification</b>	External
<b>Policy Sponsor</b>	Chief Finance and Operations Officer	<b>Policy Reference</b>	POL-028
<b>Policy Lead</b>	Head of Risk and Assurance	<b>Version Number</b>	V4.2
<b>Policy Date</b>	April 2025	<b>Policy Revision Due</b>	April 2026

## Purpose of Policy

We recognise that sometimes things go wrong in an organisation. If this happens at Macmillan, please tell us as soon as possible and we promise we will investigate it properly and that you will be protected from any unfair treatment.

## Who is covered by this policy?

This policy applies to all workers, officers, consultants, self-employed contractors, Macmillan Professionals, casual workers, agency workers, volunteers and interns. This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

### Trustees

The Board of Trustees is accountable for ensuring that the organisation has appropriate structure, processes, and resources in place to ensure safeguarding is central to everything it does. The board also monitors compliance and has overall responsibility for the effective operation of this policy, including reviewing the effectiveness of actions taken in response to concerns raised under this policy.

### Chief Executive

The Chief Executive is the senior individual accountable for all aspects of whistleblowing across the organisation, including promoting a strong culture of trust and wellbeing.

### Executive Team (ET)

Each member of the ET is accountable for encouraging whistleblowing in their directorate. This includes making sure that employees are adequately supported to raise concerns.

### Chief Finance and Operations Officer (CFOO)

The CFOO is the Policy Sponsor accountable for ensuring that Macmillan has an appropriate whistleblowing policy and written procedures in place to ensure the organisation works to best practice and complies with relevant legislation.

### Finance, Risk and Audit Committee

Have oversight of the whistleblowing framework, and that incident, recommendations and actions are followed up and completed accordingly.

### Risk Team

Responsible for the day-to-day management of Whistleblowing investigations, from notification through to resolution. Whistleblowing concerns can be raised directly with the Head of Risk and Assurance. The Risk team are responsible for the Whistleblowing policy and processes and for the monitoring of the Whistleblowing mailbox.

### People & Culture (P&C)

The P&C team, where appropriate, will be involved in any investigation regarding employee behaviour, relevant provision and retention of employee information and where necessary contribute to discussions held by any whistleblowing panel.

### Safeguarding Team

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The Safeguarding Team, consisting of Safeguarding Officers and led by the Safeguarding Manager, can provide advice and emotional support in relation to this policy.

## Policy

### What is Whistleblowing?

Whistleblowing is the raising of a concern in reasonable belief about a risk, or dangerous, illegal, or unethical practice which could have a negative effect on others. This could be an issue that affects you, our supporters, service users, the public, or the trust they have in Macmillan's reputation.

Whistleblowing ultimately protects workers, beneficiaries, and the organisation itself by identifying harm before it is too late.

Workers are often the first to realise when things go wrong. Sometimes these concerns can be resolved easily and sometimes it is more difficult to know what to do. This policy sets out how you can raise concerns, and trust that you will be listened to.

### What does this policy cover?

This policy covers any genuine concerns about suspected dangerous, illegal, or unethical practices or non-compliance with Macmillan's policies and procedures whether it is happening now, took place in the past or is likely to happen in the near future. Some examples are:

- a criminal offence such as fraud or theft.
- a danger to the mental or physical safety of any individual.
- the breach of a legal or regulatory obligation (e.g. Data Protection, Fundraising rules)
- the deliberate breach of a Macmillan policy or asking others to do so.
- modern slavery – i.e. actual or suspected situations involving a person being forced, threatened or deceived into situations of subjugation, degradation and control which undermine their personal identity and sense of self. Modern Slavery also covers human trafficking and exploitation (such as non-payment of minimum wages or unlawful wage deductions). Modern slavery is prohibited by law.
- deliberately covering up evidence that shows any of the above has occurred.

It is not possible to provide an exhaustive list, but you are encouraged to raise concerns as soon as you can, even if you believe that you have not got enough evidence.

Do not worry about whether your concerns fall under the [legal definition of whistleblowing](#) – we want you to raise any serious concerns you might have and if necessary, we will advise you on any other appropriate route to take.

Macmillan is committed to dealing with all Whistleblowing complaints appropriately, consistently, fairly and professionally.

### What this policy does NOT cover:

Personal grievances and employment matters (for example bullying, harassment, discrimination) are not covered by whistleblowing law, unless your particular case is in the public interest (see link to PIDA (Public Interest Disclosure Act) below).

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Please also refer to the relevant [People & Culture Policies](#) e.g., Grievance Policy for further guidance.

However, if a complaint made under this Policy is a grievance where the sole or primary focus is a complaint about P&C personnel, the grievance may, where appropriate, be heard by an individual or panel external to Macmillan, which may involve our external whistleblowing partner, Safecall. The individual or panel will receive support from Macmillan's Head of Risk and Assurance, but the general principles of Macmillan's Grievance Policy will still be followed.

## Procedure

### Raising a concern

There are a number of ways of raising a concern at Macmillan:

1. Speaking with your line manager(s) as appropriate, e.g. manager, head of, director, executive director.
2. Emailing the [whistleblowing inbox](#) – this is monitored by the Macmillan Risk Team.
3. Speaking to the [Head of Risk and Assurance](#).
4. Contacting [Safecall](#), an independent, confidential service which allows you to remain anonymous if you prefer.

Members of the public may also report a concern using either of the following reporting mechanisms:

- Emailing [whistleblowing@macmillan.org.uk](mailto:whistleblowing@macmillan.org.uk)
- Via the anonymous reporting platform Safecall, an independent and confidential service on 0800 915 1571 or [macmillan@safecall.co.uk](mailto:macmillan@safecall.co.uk). Safecall notify Macmillan of concerns raised while protecting the anonymity of the Whistleblower.

Guidance for this is available on Macmillan's main website.

You can expect an acknowledgment of receipt of your disclosure within 5 working days.

When you raise a concern, please provide all known details including how you found out about it and any evidence you already have. You do not need to have any evidence before you raise a concern and do not try to investigate matters on your own.

You can email the whistleblowing inbox	
<a href="mailto:whistleblowing@macmillan.org.uk">whistleblowing@macmillan.org.uk</a>	
You can speak to the Head of Risk and Assurance (internal workers)	
<a href="mailto:kysmith@macmillan.org.uk">kysmith@macmillan.org.uk</a>	
You can also contact the Safeguarding Team for emotional support	
<a href="mailto:safeguarding@macmillan.org.uk">safeguarding@macmillan.org.uk</a>	

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You can contact Safecall		
macmillan@safecall.co.uk	0800 915 1571	www.safecall.co.uk/report

We will review the evidence and information provided, conduct meetings with relevant people, and consider any other available supporting evidence. We will make every effort to investigate your concern in a fair, objective, consistent and discreet way, as quickly as possible. Once an outcome has been reached, Macmillan will take any necessary and appropriate action.

### Conflicts of interest

The nature of an allegation may mean that it is not appropriate for particular internal roles to have an involvement in the investigation. The triage system assists Macmillan in retaining independence and objectivity in such instances.

### Results and remedial action

Some concerns can be resolved by carrying out certain remedial actions and a detailed investigation is unnecessary. If, after investigation, there is evidence that it involves criminal activity your concern will be reported to the police.

The results will also be communicated to the Chief of Staff and a summary to the Finance, Risk & Audit Committee (FRAC) chair as appropriate.

We recognise that you may need assurances that the issue has been dealt with properly. Subject to legal constraints, we will let you know what the outcome is as soon as reasonably practicable. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. Please note, if you choose an anonymous route to Whistleblowing, we will not be able to provide direct feedback on the outcome.

We keep a record of concerns so that we can identify underlying issues for our workers and take steps to resolve them.

### 5: I'm still concerned

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this Policy, you can help us to achieve this. If, after the investigation, you remain concerned, you have the right to raise it in confidence with the Chief Executive and/or the Chairman of the Board of Trustees.

Macmillan recognises your legal right to raise a concern with a prescribed person or body rather than us.

Key contacts are:

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- Chairman of the Board of Trustees / Chief Executive Officer: [rmurley@macmillan.org.uk](mailto:rmurley@macmillan.org.uk) / [gpeters@macmillan.org.uk](mailto:gpeters@macmillan.org.uk)
- Charity Commission for England & Wales: [whistleblowing@charitycommission.gov.uk](mailto:whistleblowing@charitycommission.gov.uk) or 0300 066 9197. For guidance or examples – <https://www.gov.uk/government/organisations/charity-commission#org-contacts>
- Office of the Scottish Charity Regulator: [C&I@oscr.org.uk](mailto:C&I@oscr.org.uk) or [info@oscr.org.uk](mailto:info@oscr.org.uk) or 01382 220446. <https://www.oscr.org.uk/contact-oscr/charity-concern-form/>
- Fundraising Regulator: <https://www.fundraisingregulator.org.uk/complaints/make-complaint>
- Scottish Fundraising Adjudication Panel: [info@goodfundraising.scot](mailto:info@goodfundraising.scot) or 0808 164 2520. <https://goodfundraising.scot>
- Charity Commission Northern Ireland – 0283832 0220 or <https://www.charitycommissionni.org.uk/about-us/contact-us/>

Other prescribed people and bodies are listed on the [Government website](#): the correct body to contact will depend on the issue you wish to raise.

## Guidance

### a) I am worried about my position if I raise a concern. Will I be protected?

Macmillan will ensure that you do not suffer any disadvantage because you have raised a genuine concern. This includes:

- Not being promoted
- Having training requests denied
- Being monitored more closely
- Being ostracised, victimised, bullied or harassed
- Being denied the resources you need to do your work
- Being reassigned, relocated or demoted
- Being suspended, subject to disciplinary sanctions, or dismissed
- Not being provided with an appropriate reference
- Not being able to raise concerns in the future

Macmillan will not tolerate any detriment to workers who blow the whistle. Any Macmillan colleague who victimises, mistreats, bullies, or harasses a colleague who discloses a concern under this policy may be subject to disciplinary action which could lead to dismissal.

### b) Can I raise a concern anonymously?

We understand that it can be difficult to come forward and raise a concern. If you decide to report a concern anonymously, we will do our best to investigate it, but we may not be able to take the concern further if you have not provided all the information we need. However, by using the Safecall platform, you can ask for your name not to be disclosed to Macmillan but to allow Safecall to contact you for more information, if necessary.

Please note, if you choose an anonymous route to Whistleblowing, we will not be able to provide direct feedback on the outcome. It may also be more difficult to afford protections. Whistleblowers qualify if disclosures are made anonymously due to their being no link between

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the disclosure, evidence provided and the colleague, however, we will make best efforts to ensure workers are treated fairly.

**c) What if I go to the media with my concern?**

If you report your concern to the media, you may not be protected by the [Public Interest Disclosure Act \(PIDA\)](#) as the Act makes special provision for disclosures to 'prescribed persons', e.g. The Charity Commission is the regulatory body to whom workers can make appropriate disclosures on matters relating to 'the proper administration of charities and funds given, or held, for charitable purposes'.

We would therefore encourage to report your concern using this policy in the first instance and to seek advice before reporting a concern to anyone external – for instance, the independent whistleblowing charity, Protect, operates a confidential helpline. Their contact details are at the end of this Policy.

**d) What is the difference between a grievance and whistleblowing?**

A grievance is a matter of personal interest such as your own relationship with your line manager(s) and it does not impact on the wider public or Macmillan organisation. If you are a Macmillan worker, please see the Macmillan [Grievance Policy](#).

**e) What will happen to me if I raise a concern, but the investigation finds no evidence?**

If you have raised a genuine concern, then you will not be treated unfairly. Anyone who mistreats you as a result of your disclosure may be subject to disciplinary action.

**f) What will happen to someone who raises a false concern maliciously?**

If someone makes an allegation for malicious reasons or for personal gain, it will be treated as a serious disciplinary offence.

**g) What other support and advice is available for me?**

Macmillan workers can access the Employee Assistance Program. The EAP support line is available at any time, open 24 hours a day and is completely confidential. It is free to call from landlines on 0800 028 0199. From outside the UK call +44 161 836 9498 (calls will be charged). You can also access EAP support via an online chat or the My Health Advantage app. For more information, please visit the [EAP page on Green Rooms](#).

There are many other independent sources of information and support about whistleblowing if you want more advice:

- The whistleblowing charity, Protect, have advice on their website [protect-advice.org.uk/](https://protect-advice.org.uk/) or on 020 3117 2520
- The law that protects whistle-blowers' is set out here as to who and what is covered / not covered <https://www.gov.uk/whistleblowing>
- Citizens Advice can provide you with independent legal advice <https://www.citizensadvice.org.uk/>

## Compliance and Exceptions

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Failure to adhere to this policy could result in breaches of the law, breaches of contract and/or reputational damage to Macmillan and could, therefore, result in disciplinary action through the employee procedures or volunteer problem solving guidance.

If you have any concerns or believe that this policy may be breached, please contact the Head of Risk and Assurance, the Director of Risk or the Chief Finance and Operations Officer

## Approvals

The final approval level for this policy is the Trustees' Finance, Risk & Audit Committee.

## Relevant legislation:

Public Interest Disclosure Act

## Document Location

[Macmillan website](#)

## Document review and approvals

This policy will be reviewed annually, or earlier if circumstances require.

Name & job title	Role (eg author, reviewer, approver)	Date	Version	Comments
Consultant	Author	2018	V1	New Whistleblowing Policy
Lorna Hudson, Risk & Compliance Manager	Minor Update	22.02.2019	V2.1	Minor Updates Whistleblowing Policy
Liam Colman, Communications Manager	Reviewer	27.02.2019	V2.2	Some suggestions and amendments made.
Sophie Rughani, Internal Audit	Author - Update	27.08.2020	V3	Updated changes, e.g., in organisation, external contacts, information
Steve Clayton, Chief Financial Officer	Reviewer	18.09.2020	V3	Approved
Finance & Audit Committee	Approver	17.11.2020	V3	Approved
Neil Morter, Senior Safeguarding Manager	Minor update	11.05.2023	V3.1	New template + updated some of the weblinks and role titles and added role/responsibilities
Rachel Morris, Assistant Company Secretary	Minor update	13.05.2021	V3.1	Policy lead changed from Internal Audit Manager to Head of Risk, Governance and Compliance
Rachel Morris, Assistant Company Secretary	Minor update	06.10.2021	V3.2	New whistleblowing email address
Kym Smith, Head of Risk, Governance and Assurance	Reviewed	18.08.2023	V3.3	Minor updates made pending a fuller review later in the year
Anna Scott-Green, Senior Crisis & Incident Manager	Reviewed	26.02.2024	V3.4	Reviewed in line with new Incident Reporting Policy. Checked all links and phone numbers listed. Recommended further info on how Safecall manage what is reported to them.
Kym Smith, Head of Risk, Governance and Assurance	Reviewed	06.03.2024	4.1	Addition of triage system and conflicts of interest position, amendments to panel formation and outcome timeframes. Updated Safecall reporting details. Updated role titles.
Kym Smith, Head of Risk and Assurance	Reviewed	13/02/2025	4.2	Updates to language, process and responsibilities. Reviewed with Legal team to reflect best practice.
Finance, Risk and Audit Committee	Approved	22/04/2025	5.0	Approved

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