



Kennett Community Land Trust

Whistleblowing Policy

Kennett Community Land Trust is a Community Benefit Society registered with the FCA under number 7443, registered office 66 Station Road, Kennett, Newmarket CB8 7QF

Whistle Blowing Policy

1 Introduction

Kennett Community Land Trust ("KCLT") is committed to maintaining high standards of conduct in all its work and in all its contacts with the local community and its stakeholders.

It is important that any fraud, misconduct or wrongdoing by those acting on behalf of KCLT is reported and properly dealt with.

2 Purpose and Scope

KCLT is committed to being open, honest and accountable. It encourages a free and open culture in its work, whether performed by its Trustees, those working with the charity, its volunteers, contractors and its employees.

It is therefore essential that anyone raises any concerns that they may have about the conduct of others in the charity or the way in which the organisation is run. This policy sets out the way in which individuals may raise concerns and how those concerns will be dealt with.

This policy applies to all those who come into contact with KCLT's work, including all employees, officers, consultants, contractors, trainees, homeworkers, casual and agency staff and volunteers.

3 Definition of Whistleblowing

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'. For the purposes of this Policy a Qualifying Disclosure is one made by anyone 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 in connection with KCLT's work.

It is not necessary to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient.

A person making a Qualifying Disclosure has no responsibility for investigating the matter – it is KCLT's responsibility to ensure that an investigation takes place.

No one making a Qualifying Disclosure may be dismissed, subjected to any other detriment, or victimised, because of the disclosure.

4 Principles

Everyone should be aware of the importance of preventing and eliminating wrongdoing and should be watchful for illegal or unethical conduct, reporting anything of that nature that they become aware of.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.

No one may be victimised for raising a matter under this procedure. This means that continued employment, opportunities for volunteering or for future promotion or training.

The following are regarded as instances of serious misconduct and (where they involve an KCLT employee or volunteer) will be dealt with in accordance with ACAS code of practice on disciplinary and grievance procedures.

- victimisation of someone for raising a Qualified Disclosure;
- misconduct discovered as a result of any investigation made under this Policy;
- maliciously making a false allegation;
- asking someone to cover up wrongdoing or suppress a Qualifying Disclosure.

Anyone who is told or advised not to raise or pursue any concern or not to make a Qualifying Disclosure should not remain silent and should act in accordance with this Policy.

5 Whistleblowing Procedure

Raising concerns

- Concerns should be raised in writing to the **secretary at** hello@kennettclt.org
- If the concern involves a member of the Board of Trustees, the concern should be reported directly to the **Chair of Trustees**
- Include relevant details: names, dates, locations, and nature of concern
- Anonymous disclosures will be considered but may limit investigation

Investigating concerns

The Board of Trustees will appoint someone with appropriate experience and no prior involvement in its subject matter, who will:

- conduct a fair and impartial investigation in accordance with this Policy;
- arrange one or more fact-finding meetings with the Whistleblower (and a colleague nominated by the Whistleblower if reasonably requested) the first usually within one week from receipt of the disclosure; and
- if necessary, arrange further meetings with potential witnesses.

At the end of the investigation, the investigator will submit a report to the Board, who will have responsibility for ensuring that appropriate action is taken, including:

- reporting of the matter to the police, local authority or relevant regulatory agency; and
- where there is evidence of misconduct by an KCLT employee or volunteer, taking any disciplinary measures which are judged appropriate in accordance with the Disciplinary Procedure.

The Secretary, on behalf of the Board will communicate to the Whistleblower in writing:

- the investigator's principal findings;
- the Board's conclusions; and
- the actions agreed by the Board, or if no action is to be taken the reasons.

A Whistleblower who reasonably believes appropriate action has not been taken, they should in the first instance should express their concerns regarding the investigation or action taken to the Secretary at hello@kennettclt.org. the Secretary will inform the Board of Trustees, who will consider is additional investigation or action is required.

The Whistleblower remains unsatisfied with the outcome may further report the matter to the relevant statutory body. This may include:

- 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

6 Confidentiality

Confidentiality is vital the effective handling of a whistleblowing concern and everyone involved in the operation of this Policy is responsible for observing the high level of confidentiality that is required. In particular:

- details of any investigations and the name of any Whistleblower must only be disclosed where genuinely necessary to pursue the investigation and for no other purpose;
- any personal data collected in connection with the concern raised or an investigation will be held in accordance with KCLT's Privacy and Data Protection Policies. KCLT will take all reasonable steps to ensure that such data will be held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

A breach of confidentiality will be treated as a case of gross misconduct which, in the case of KCL volunteers and employees, will be dealt with under the terms of the ACAS code of practice on disciplinary and grievance procedures.

7 Equality, Diversity and Inclusion

KCLT is committed to promoting equality, diversity, and inclusion in all aspects of its work. We believe that embracing diversity strengthens our community, enhances our services, and reflects our core values of respect, fairness, and integrity.

We aim to create an environment where everyone feels valued, respected, and empowered—regardless of their background, identity, or circumstances.

We will apply this policy consistently and fairly and will not discriminate against anyone based on any protected characteristics, including those set out in the Equality Act 2010

8 Review and Monitoring

- All whistleblowing concerns will be recorded and dealt with by the board of trustees in line with applicable legislation at the time of the concern and the Trustee Handbook and governance framework
- This policy will be reviewed every two years or following legislative changes

9 Related Policies and Documents.

- Tenancy Agreement
- Privacy Policy
- Safeguarding Policy
- Health & Safety Compliance Policy
- Equality, diversity and Inclusion Policy
- Customer Feedback and Complaints Policy

10 Policy Review Record

Version Number	Status	Revision Date	Summary of Changes
Version 01	Approved	September 2025	New Policy