



<b>Title of policy:</b>	Whistleblowing Policy
<b>Version:</b>	6
<b>Purpose:</b>	To set out a clearly defined policy regarding Whistleblowing
<b>Updated:</b>	March 2022
<b>Next review:</b>	March 2024
<b>By:</b>	Head of People Services

## Context

North Star wants to encourage staff and other stakeholders (Board members, customers, partners, members of the public, etc.) to raise concerns whenever they arise. In even the best run Organisation, things can go wrong and we rely on staff, Board members and other stakeholders to let us know so that we can put things right.

In line with our Code of Conduct, North Star is committed to the highest standards of quality, probity, openness and accountability and positively encourages employees at all levels to express concerns about suspected wrongdoing in how it manages its affairs.

Our approach to whistleblowing is therefore positive and open and we will support individuals if they come forward with concerns that they feel need to be addressed. This Policy therefore aims to encourage and enable staff and others to raise serious concerns by “speaking up” within North Star, rather than overlooking a problem or raising the issue outside the Organisation which could potentially leave North Star powerless to address what may be going on.

The aims of this Whistleblowing Policy are to:

- Enable and encourage staff, Board members and other stakeholders to raise concerns.
- Provide assurance that North Star will address any such concerns which are raised.
- Allow the matter to be taken further if the whistleblower is dissatisfied with North Star’s response; and
- Give reassurance of protection from reprisals or victimisation for whistleblowing in good faith.

## What is Malpractice or Wrongdoing?

Malpractice or wrongdoing can include (but is not limited to) an action/or inaction that is:

- Unlawful
- Negligent
- A breach of North Star’s and its members rules and Procedures, Standing Orders, Code of Conduct or Policies.
- Not in accordance with established standards of practice.



- A danger to the health and safety of any person or group.
- Improper conduct.
- Any attempt to cover up any of the events or practices described above.

The overriding concern should be that it would be in the public interest for malpractice to be corrected and if appropriate sanctions to be applied.

The following are examples of issues which could be raised under this Policy:

- a) Any unlawful act or omission, whether criminal or a breach of civil law.
- b) Maladministration.
- c) Breach of any statutory code of practice.
- d) Breach of or failure to implement or comply with any policy or code of conduct determined by the Organisation and its Board.
- e) Failure to comply with appropriate professional standards or other established standards of practice.
- f) Bribery, corruption, money laundering or fraud.
- g) Actions which are likely to cause physical danger to any person or give rise to a risk of significant damage to property.
- h) Failure to take reasonable steps to report or rectify any situation which is likely to give rise to a significant avoidable cost, or loss of income, to the Organisation or would otherwise be seriously prejudicial.
- i) Abuse of power, or the use of the Organisation's power and authority for any unauthorised or ulterior purpose.
- j) Unfair discrimination.
- k) Dangerous procedures risking health and safety.
- l) Abuse to clients.
- m) Damage to the environment.
- n) A policy having been adopted that allows or encourages malpractice.
- o) Other unethical conduct.

This Policy is written primarily with staff in mind and as good practice its principles also apply to other people involved with North Star such as Board members, contractors and consultants. We encourage anyone to come forward and express any serious concerns they may have about any aspect of our work.

If you are involved with North Star but are not a member of staff and you have a query about how to apply the policy to your specific circumstances, you can speak in confidence to the Company Secretary.

## How to Raise a Concern

Employed staff should normally raise concerns with their immediate manager. In most cases they should be the first person to address genuine concerns to. If you receive no response from your Line Manager, or are dissatisfied with the response, or feel unable to speak to your Line Manager for any reason, you should take the matter to a Director who will listen to your concerns.

If you feel you cannot raise your concerns within North Star's staff structure, you may contact the Company Secretary or the Chair of Risk & Audit Committee.



If you are a Board member, volunteer, consultant or contractor and need to raise any concerns you should approach the Chief Executive, Company Secretary, Chair of Board or Chair of Risk & Audit Committee.

Contact details are as follows:

	<b>Name</b>	<b>Telephone number and mobile</b>	<b>Email address</b>
<b>Company Secretary</b>	James Walder	01642 796345 07720 597791	<a href="mailto:james.walder@northstarhg.co.uk">james.walder@northstarhg.co.uk</a>
<b>Chair of Board</b>	Anna Urbanowicz	07872 987003	<a href="mailto:Annanorthstar@outlook.com">Annanorthstar@outlook.com</a>
<b>Chair of Risk &amp; Audit Committee</b>	Jason Ridley	07710 583876	<a href="mailto:jasonridley@talegar.com">jasonridley@talegar.com</a>
<b>Chief Executive</b>	Angela Lockwood	01642 796210 07720 597799	<a href="mailto:angela.lockwood@northstarhg.co.uk">angela.lockwood@northstarhg.co.uk</a>

We urge you to:

- Come forward with any concerns about wrongdoing at an early stage.
- Contact either your Line Manager, a Director or Company Secretary; and
- Present the facts, it is better if these are in writing setting out the background and history of the concern providing names, dates and places where possible and reasons why you are particularly concerned about the situation. If you feel you are not able to put your concerns in writing, you can telephone or meet the appropriate Manager.

We are happy for you to come forward with another colleague, friend or other advisor should you need to report a concern.

North Star hopes to provide staff with confidence in how this policy will be implemented so that initially most matters can be raised and dealt with internally. However, if you feel unable to contact a member of staff within North Star our auditors and solicitors are aware of the Organisation's policy and our wish to be open and accountable for our actions. They can also be contacted in confidence for advice and as a contact for raising concerns or starting an investigation.



Contact details are as follows:

	Name of Organisation	Contact Address
<b>Internal Auditors</b>	BDO LLP	<b>Kelly McQuigg</b> Manager/Risk & Advisory Services 07870 555 552 0113 290 6165 <a href="mailto:Kelly.McQuigg@bdo.co.uk">Kelly.McQuigg@bdo.co.uk</a> Central Square 29 Wellington Street Leeds LS1 4DL
<b>External Auditors</b>	Beever & Struthers	<b>Sue Hutchinson</b> Partner 07903 457333 0161 838 1869 E: <a href="mailto:Sue.Hutchinson@beeverstruthers.co.uk">Sue.Hutchinson@beeverstruthers.co.uk</a> St. Georges House 215 Chester Rd Manchester M15 4JE
	Name of Organisation	Contact Address
<b>Solicitors</b>	Ward Hadaway	Joe Thornhill <a href="mailto:joe.thornhill@wardhadaway.com">joe.thornhill@wardhadaway.com</a> Tel: 0191 204 4321 Sandgate House 102 Quayside Newcastle upon Tyne NE1 3DX

If you are an employee who is concerned about possible malpractice or wrongdoing within North Star, you can discuss your concerns in confidence with Public Concern at Work before raising them within North Star. You can contact Public Concern at Work as follows:

**Public Concern at Work**

Protect Advice Line: 020 3117 2520  
 Business Support: 020 3117 2525  
 General enquiries: 020 3117 2520  
[www.pcaaw.co.uk](http://www.pcaaw.co.uk)

**Raising Concerns outside North Star**

This Policy is intended to enable you to raise your concerns within the Organisation and to have them dealt with effectively. However, we recognise that in some exceptional circumstances, concerns could merit obtaining advice/reporting concerns to the Police or to regulatory bodies.

Should Board members choose to report matters to the media without making any attempt to raise their concerns internally or to one of the external parties described above, this will be deemed to be a serious breach of the Code of Conduct, unless the Board is satisfied that it was



reasonable for the member to adopt that course of action. Board members should refer to the media protocol in the Code of Conduct.

## Confidentiality

North Star will do everything it can to respect your confidentiality if you request us to do so. We will not reveal your identity, if this is your wish, unless:

- We are required to do so for legal reasons; or
- We are required to reveal your identity to relevant professionals dealing with the matter e.g. lawyers.

This Policy encourages you to put your name to the concerns you are raising. Concerns expressed anonymously are much less powerful, but they will be considered. We will, where appropriate investigate anonymous whistleblowing cases but this may restrict the scope and extent of our investigations and we are obviously unable to provide feedback on the progress of the case and results of any investigation.

Confidential records will be kept of all matters raised through the Whistleblowing Policy.

## How Will We Respond?

The action taken by North Star will depend on the nature of the concern. The matters raised may:

- Be investigated internally.
- Form the subject of an independent inquiry.
- Be referred to the External Auditor; or
- Be referred to and investigated by the Police.

If you have given us your contact details, within five working days of a concern being received, North Star will write to you:

- Acknowledging that the concern has been received.
- Indicating how it proposes to deal with the matter.
- Giving an estimate of how long it will take to provide a final response.
- Telling you whether any initial enquiries have been made; and
- Telling you whether further investigations will take place, and if not, why not.

## Untrue Allegations

All concerns brought to our attention will be dealt with impartially, thoroughly and with care. No action will be taken against a person making allegations as long as they were made in good faith. However, we also have a duty to be fair to any other individual(s) the matter may involve. In doing so, we will use the disciplinary procedure to deal with any individuals, including the person raising the matter, if there is an abuse of this policy at any stage during the process.

## Monitoring, Reporting and Review

This Policy will be reviewed every 24 months or following any material legislative changes.

The Risk & Audit Committee will receive reports relating to any matters of whistleblowing or alleged or actual fraudulent activity which may have an effect upon the Organisation.

