

WHISTLEBLOWING POLICY

Clinical Psychology & Employee Wellbeing Practice

1. Policy Statement

At the Origami Group we are committed to the highest standards of ethical practice, client safety, and professional integrity. We encourage an open culture where concerns about malpractice, misconduct, or unethical behaviour can be raised without fear of victimisation or reprisal. This policy sets out our approach to whistleblowing and how concerns should be reported, investigated, and resolved.

We recognise our duty to protect clients, employees, and the reputation of our practice - and that includes creating a safe space for concerns to be raised and addressed responsibly.

2. Purpose

This policy aims to:

- Encourage staff to raise concerns about malpractice at the earliest opportunity.
- Provide clear channels for reporting wrongdoing.
- Protect whistleblowers from victimisation or dismissal.
- Ensure concerns are dealt with fairly, confidentially, and promptly.
- Meet our obligations under the **Public Interest Disclosure Act 1998 (PIDA)** and relevant professional codes (e.g. BACP, UKCP, HCPC).

3. Scope

This policy applies to:

- All employees, contractors, and self-employed therapists
- Clinical supervisors and administrative staff
- Trainees, volunteers, or others working on behalf of the practice
- Concerns raised about any aspect of the practice, including staff, processes, or services

This policy is distinct from grievances (which are about personal employment matters) and should be used when the concern relates to the **public interest** - such as harm to clients or breaches of law, ethics, or safety.

4. What Can Be Reported?

You should use this policy to report concerns including (but not limited to):

- **Clinical malpractice** or unsafe therapeutic practice
- **Risk to clients' mental or physical health**
- **Safeguarding concerns** not appropriately acted upon
- **Fraud, financial mismanagement, or corruption**
- **Data breaches** or serious confidentiality violations
- **Harassment, discrimination, or bullying** involving staff or clients
- **Breach of ethical standards** (e.g. dual relationships, boundary violations)
- **Failure to follow legal or professional obligations**

If you're unsure whether your concern qualifies, you are encouraged to raise it anyway. It will be reviewed and redirected if necessary.

5. Our Commitments to You

We guarantee:

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- Your concern will be taken seriously and acted upon promptly.
- You will not be penalised or dismissed for raising a concern in good faith.
- Your identity will be kept confidential wherever possible.
- You have the right to escalate the concern externally if it is not addressed adequately.

6. How to Raise a Concern

Step 1: Internal Reporting

Raise the concern with your:

- **Line Manager or Supervisor**
- Or, if inappropriate or unavailable, contact the **Clinical Director** or **Whistleblowing Lead**

Concerns may be raised:

- Verbally (in a private meeting)
- In writing (via email or using a Whistleblowing Reporting Form)
- Anonymously, if you prefer - though anonymous concerns may limit the ability to investigate

Please include:

- The nature of the concern and any supporting evidence
- Relevant dates, people, or locations
- Whether you have any personal involvement or potential conflict of interest

Step 2: Investigation

- The concern will be acknowledged within **5 working days**.
- A confidential fact-finding review will begin, led by a senior staff member or independent party where necessary.
- You may be asked for more information or to participate in the process (with support).
- Most investigations will conclude within **20 working days**, though complex matters may take longer.

Step 3: Outcome and Follow-up

- You will be informed of the outcome (where confidentiality allows)
- Appropriate action will be taken, which may include disciplinary processes, safeguarding referrals, or service changes
- If you are not satisfied with the outcome, you may escalate the concern further (see section 8)

7. Protection and Support for Whistleblowers

- **No retaliation:** We do not tolerate bullying, victimisation, or discrimination against those who raise concerns.
- **Confidentiality:** Your identity will be protected unless disclosure is legally required or with your consent.
- **Support:** Counselling or psychological support may be offered through our wellbeing resources or external referral.

If you believe you are being penalised for whistleblowing, you should report this to the Clinical Director or HR Lead.

8. Escalation and External Reporting

If you feel unable to raise the concern internally, or are not satisfied with how it was handled, you may contact:

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- **BACP Ethics Services:** 01455 883300
- **UKCP Complaints & Conduct Team**
- **Care Quality Commission (CQC)** (if regulated by CQC)
- **Information Commissioner's Office (ICO)** (for data breaches)
- **Public Concern at Work (Protect):** 020 3117 2520 – www.protect-advice.org.uk

Ensure that any external reporting is made in good faith and does not breach client confidentiality unlawfully.

9. Record Keeping

- All whistleblowing reports will be recorded in the **Confidential Incident Log**
- Investigation documents will be securely stored and retained for **7 years**
- Access is limited to authorised individuals only

10. Training and Awareness

- All staff are introduced to this policy during induction
- Refresher training and awareness sessions will be provided annually
- Managers will be trained in how to handle concerns appropriately and lawfully

11. Policy Review

This policy will be reviewed **annually** or following significant changes to legislation, clinical governance, or professional guidance.

Policy Version: 1.0

Approved by: Amy Stoddard-Ajayi

Role: CEO and Founder

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