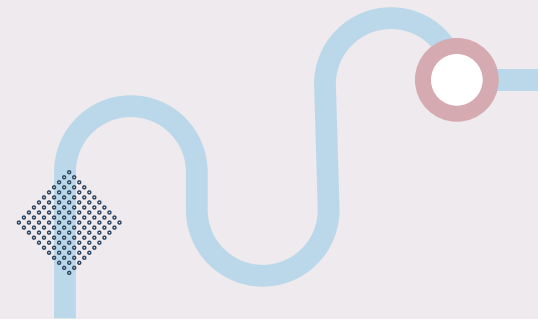


# Whistleblowing Policy



Centre Name	
Centre Address	

Policy Name	Whistleblowing Policy
Policy Number	
Date Created	
Effective Date Adopted by the Board	
Version Number	
Date of Last Version	
Administrator Responsible	
Administrator Contact Information	

## POLICY HISTORY

Version Number	Approved by	Revision Date	Author

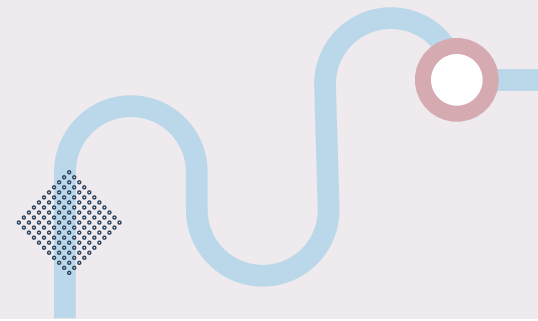
## DOCUMENT CONTROL

Document Ref		Title	Whistleblowing Policy
Version & Date		Author	
Directorate:		Approved by Management	
Reviewed		Change History	

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# Whistleblowing Policy



Enter Centre Name Here

## OVERVIEW

Whistleblowing occurs when an employee raises a concern or discloses information which relates to wrongdoing, illegal practices or unethical conduct that has come to their attention through work.

Our Whistleblowing policy is intended to encourage and enable employees to raise concerns within \_\_\_\_\_ rather than overlooking a problem or "blowing the whistle" externally. Under this policy an employee is entitled to raise concerns or disclose information without fear of penalisation or threat of less favourable treatment, discrimination or disadvantage.

\_\_\_\_\_ is committed to maintaining an open culture with the highest standards of honesty and accountability, where our employees can report any concerns in confidence.

This policy applies to all of our employees, at all levels.

## SCOPE

This policy applies to all of our workers including employees at all levels.

## REFERENCES

Industrial Relations Act 1990 (Code of Practice on Protected Disclosures Act 2014) (Declaration) Order 2015.

## POLICY / PROCEDURE

### Aims of the Policy

- To encourage employees to feel confident and safe in raising concerns and disclosing information.
- To provide avenues for employees to raise concerns in confidence and receive feedback on any action taken.
- To ensure that employees receive a response where possible to their concerns and information disclosed.
- To reassure employees that they will be protected from penalisation or any threat of penalisation

### What Types of Concerns Can be Raised?

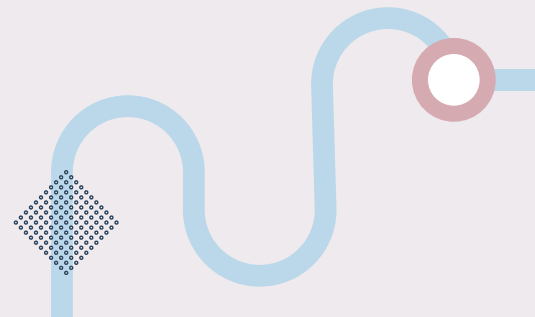
A concern or disclosure should relate to a relevant wrongdoing such as possible fraud, crime, danger or failure to comply with any legal obligation that has come to an employee's attention in connection with \_\_\_\_\_ and about which they have a reasonable belief of wrongdoing.

### What Types of Concerns Should Not be Raised under This Procedure?

A personal concern, for example a grievance around an employee's own contract of employment would not be regarded as a whistleblowing concern and would be more appropriately processed through the Grievance Procedure.



# Whistleblowing Policy



## **Safeguards and Penalisation**

An employee who makes a disclosure and has a reasonable belief of wrongdoing will not be penalised by \_\_\_\_\_, even if the concerns or disclosure turn out to be unfounded.

Penalisation includes suspension / dismissal, disciplinary action, demotion, discrimination, threats, or other unfavourable treatment arising from raising a concern or making a disclosure on the basis of reasonable belief for doing so. If an employee believe that they are being subjected to penalisation as a result of making a disclosure under this Procedure, they should inform their manager immediately.

Employees who penalise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.

Employees are not expected to prove the truth of an allegation. However, they must have a reasonable belief that there are grounds for their concern. It should be noted that appropriate disciplinary action may be taken against any employee who is found to have raised a concern or raised a disclosure with malicious intent.

## **CONFIDENTIALITY**

\_\_\_\_\_ is committed to protecting the identity of the employee raising a concern and ensures that relevant disclosures are treated in confidence. The focus will be on the wrongdoing rather than the person making the disclosure.

However, there are circumstances, as outlined in the referenced Act, where confidentiality cannot be maintained, particularly in a situation where the employee is participating in an investigation into the matter being disclosed. If such a situation arises, \_\_\_\_\_ will make every effort to inform the employee that their identity may be disclosed.

## **Raising a Concern Anonymously**

A concern may be raised anonymously. However, on a practical level it may be difficult to investigate such a concern. \_\_\_\_\_ would encourage employees to put their names to allegations, with our assurance of confidentiality where possible, in order to facilitate appropriate follow-up. This will make it easier for us to assess the disclosure and take appropriate action, including an investigation if necessary.

## **Who Should you Raise your Concern with?**

As a first step, appropriate concerns should be raised with your immediate Manager or their superior. However, if you do not wish to use this route, for example given the seriousness and sensitivity of the issues involved, you should approach Senior Management.

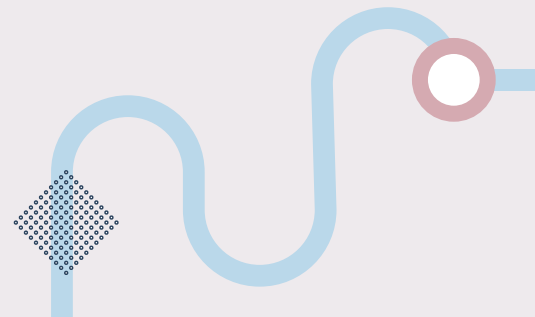
## **How to Raise a Concern**

Concerns may be raised verbally or in writing. If an employee raises a concern verbally, \_\_\_\_\_ will keep a written record of the conversation and provide them with a copy after the meeting. If an employee raises a concern in writing, \_\_\_\_\_ will ask them to give the background and history of the concern, providing relevant details, insofar as is possible, such as dates, the sequence of events, and a description of circumstances.

The earlier the employee expresses the concern, the easier it will be for \_\_\_\_\_ to deal with the matter quickly.



# Whistleblowing Policy



Once the employee has raised their concern, \_\_\_\_\_ will arrange a meeting to discuss the matter with them on a strictly confidential basis. \_\_\_\_\_ will need to clarify at this point if the concern is appropriate to this procedure or if it is a matter more appropriate to its other procedures, such as its Grievance or Dignity in the Workplace Procedures. The employee can choose whether or not they want to be accompanied by a colleague or a trade union representative. With regard to confidentiality, it is important that there should be an awareness of respecting sensitive company information, which, while unrelated to the disclosure, may be disclosed in the course of a consultation or investigation process.

## How the Company Will Deal with the Employee's Disclosure

Having met with the employee regarding their concern, and clarified that the matter is in fact appropriate to this procedure, \_\_\_\_\_ will carry out an initial assessment to examine what actions it needs to take to deal with the matter. This may involve simply clarifying certain matters, clearing up misunderstandings, or resolving the matter by agreed action without the need for an investigation.

If, on foot of the initial assessment, \_\_\_\_\_ concludes that there are grounds for concern that cannot be dealt with at this point, it will conduct an investigation that will be carried out fairly and objectively. The form and scope of the investigation will depend on the subject matter of the disclosure.

Disclosures may, in the light of the seriousness of the matters raised, be referred immediately to the appropriate authorities. Likewise, if urgent action is required (for example to remove a health & safety hazard), this action will be taken.

It is important to \_\_\_\_\_ that the employee feels assured that a disclosure made by them under this policy is taken seriously and that they are kept informed of steps being taken by the Centre in response their disclosure. In this regard, \_\_\_\_\_ undertakes to communicate with the employee as follows:

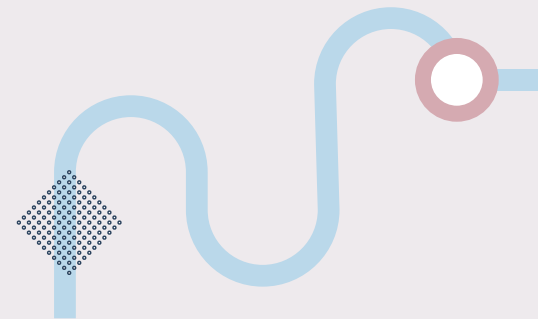
- It will acknowledge receipt of the employee's disclosure and arrange to meet with them as outlined above.
- It will inform the employee of how it proposes to investigate the matter and keep them informed of actions, where possible, in that regard, including the outcome of any investigation, and, if it is the case, why no further investigation will take place. However, it is important to note that sometimes the need for confidentiality and legal considerations may prevent the Centre from giving the employee specific details of an investigation.
- It will inform the employee of the likely time scales in regard to each of the steps being taken but, in any event, it will commit to dealing with the matter as quickly as practicable.

It is possible that during an investigation the employee may be asked to clarify certain matters. To maximise confidentiality, such a meeting can take place off site, and the employee can choose whether to be accompanied by a colleague or trade union representative.

Where a concern is raised or a disclosure is made in accordance with this policy, but the allegation is subsequently not upheld by an investigation, no action will be taken against the employee making the disclosure and the employee will be protected against any penalisation.



# Whistleblowing Policy



## **ROLES AND RESPONSIBILITIES**

Overall responsibility for policy implementation rests with the General Manager or other person, from time to time, in charge of the workplace.

However, the implementation of this policy requires an ongoing effort by all employees. Therefore, all staff, contractors, visitors and members of the public have an obligation to adhere to it.

## **DATA PROTECTION**

Please refer to the organisations Data Protection Policy

## **Performance Measurement**

This policy will be continually reviewed and updated to ensure compliance with legislation.

