

# Whistleblowing Policy

<b>Scope:</b>	Society wide
<b>Owner:</b>	Director of HR and Training (Vicki Webb)
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**Review:**

Annual review by: Director of HR and Training (Vicki Webb)

**Revision History**

Version	Revision Date	Summary of Changes
Version 1.0	24/04/2017	Added Coversheet
Version 2.0	15/7/20	Changed SID contact details.

## Approved Stages

This document has been reviewed by: Board

Committee/Approver	Date of Approval	Version
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## INTRODUCTION

It is important to the business that any fraud, misconduct or wrongdoing by employees or directors of the organisation is reported and properly dealt with. The Society therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the business or the way in which the business is run.

## OBJECTIVES

This policy sets out the way in which you may raise any concerns that you have and how those concerns will be dealt with.

## SCOPE

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## POLICY STATEMENT

The Public Interest Disclosure Act 1998 provides protection to workers who raise a legitimate concern about specific issues in the public interest. These are called "qualifying disclosures". The areas in which qualifying disclosures might be made are instances of, but are not limited to, the following:

- 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;

It is not necessary for you to have proof that there is wrongdoing, only a reasonable belief. You have no responsibility to investigate, and are encouraged not to do so. It is the Society's obligation to investigate any concerns raised through the proper channels. This will normally involve a meeting with you to discuss your concerns. You have the right to be accompanied by a colleague to this meeting should you wish to.

You, as a worker raising the qualifying disclosure, are protected from any adverse action, including dismissal, taken against you because you raised the concern.

The Society has an appointed person, the Group Secretary and Director, whose role it is to deal with cases of whistle-blowing. Alternatively, you may contact the Senior Independent Director.

## HOW TO MAKE A DISCLOSURE

- a. If you suspect that some-one or some people may have committed, or are about to commit, an illegal act or a wrongdoing, you should contact either the Group Secretary or a member of the HR team, and explain your concern. If you feel unable to talk to either of these parties, you should contact the Senior Independent Director, Patrick Muir (07748974750 or patrickmuir@mac.com). You will be asked for a written statement.
- b. The concerns will be investigated promptly and confidentially by the Group Secretary or Senior Independent Director who will report the outcome of the investigation to the Board.
- c. Any further action will be taken which may include reporting the matter to the appropriate law enforcement body, government or regulatory body, and/or taking disciplinary action against those involved.
- d. You will be informed of the outcome of the investigation and any resulting action.
- e. If you reasonably feel that the appropriate action has not been taken by the Society, you should report the matter to the appropriate government or regulatory body including the PRA or FCA.
- f. If you feel that you have suffered any detriment as a result of raising the issue, you should report this to the Group Secretary and Director, the Senior Independent Director or an appropriate external body.

## **RESPONSIBILITY FOR THE POLICY**

The Senior Independent Director who is a Non-Executive Director and member of the Board, has overall responsibility for ensuring this policy complies with our legal, regulatory and ethical obligations, and that all those under the Society's control comply with it.

The Group Secretary has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, and dealing with any queries about it.

The Senior Independent Director will review the policy annually including any reported cases, and will report to the Board on its effectiveness or any modifications required.

## **COMPLIANCE WITH THE POLICY**

You must ensure that you read, understand and comply with this policy.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting their suspicions in good faith.

## **COMMUNICATION AND AWARENESS OF THIS POLICY**

This policy forms part of our Staff Handbook and staff are made aware of it during their induction process. Awareness of the policy is reinforced through other training and through our knowledge reinforcement tool, Nelly.

## **BREACHES OF THIS POLICY**

Anyone who is found to have victimised someone for raising a concern under this policy, will be subject to disciplinary action.

Anyone raising false allegations maliciously or for personal gain will be subject to disciplinary action.

## **FURTHER ADVICE AND SUPPORT**

Further support and advice on whistleblowing issues is available through the charity Public Concerns and Work (PCaW) 020 7404 6609.