

Whistleblowing policy – raising serious concerns

1. Introduction

- 1.1 Raising concerns at or about work can be one of the most difficult and challenging things to do in a work environment. All of us, at one time or another may have concerns about what is happening at work. Usually these concerns can be easily resolved. Sometimes they may be about the performance or behaviour of colleagues, occasionally they may be about unlawful conduct, financial malpractice or dangers to the public, the staff or the environment and it can be difficult to know what to do.
- 1.2 The Public Interest Disclosure Act (PIDA) 1998 provides protection for workers who raise legitimate concerns about specified matters. These matters should be issues that are of public interest, for example;
 - A criminal offence that has, is being, or is likely to be committed
 - Suspected fraud or misuse of funds
 - Failure to comply with a legal obligation
 - Unauthorised or inappropriate disclosure, misuse or loss of confidential, personal and / or sensitive information
 - A miscarriage of justice
 - An act causing damage to the environment
 - A danger to the health and safety of employees
 - Attempts to suppress or hide information relating to any of the above.
- 1.3 The legislation does not offer protection for every concern. Issues that are NOT covered are personal grievances concerning an individual's terms and conditions of employment or related matters.
- 1.4 All employees have a right and a moral responsibility to report improper actions and omissions. Indeed, there are some circumstances in which you may be breaching your contract and/or breaking the law if you do not raise your concern with management or an appropriate body.
- 1.5 You may be worried about raising issues of concern. You may feel that raising the matter would be disloyal to colleagues, managers or the organisation or you may want to keep the concerns to yourself. If something is troubling you, which you think should be looked into; you should use this policy to deal with the matter.
- 1.6 The Professional Standards Authority (the Authority) is committed to this policy. If you raise a genuine concern under this policy you will not risk losing your job

or suffering any form of retribution as a result. If you are acting in good faith and believe the matter to be substantially true it does not matter if you are mistaken. However, if a matter is maliciously raised when known to be untrue, or maliciously discussed with other staff, we do not extend the same assurance and the matter may be dealt with under the disciplinary procedure.

2. Confidentiality

- 2.1 While the Authority will not tolerate any harassment or victimisation of anyone,, we do recognise that you may nevertheless want to raise a concern in confidence under this policy. If you ask for protection of your identity by keeping your confidence it will not be disclosed without your consent unless we are required to do so by law. If the situation arises where the Authority is not able to resolve the concern without revealing your identity this will be discussed with you in order that you may decide whether or not you wish to proceed.

3. Concerns raised anonymously

- 3.1 As the Authority has such a small number of staff the anonymous raising of concerns is not encouraged, identification may prove easy meaning that anonymity cannot be maintained. Therefore we hope that the assurances given in the clause above will give you the confidence to identify yourself at the outset when raising a concern.

4. Raising concerns

Raising concerns internally

Step 1

- 4.1 Where possible you should raise any matter of concern, serious or otherwise with your line manager. This may be done either verbally or in writing.

Step 2

- 4.2 If you feel unable, for whatever reason, to raise the matter with your line manager in the first instance, you may go to one of the management team – the Director of Standards and Policy or the Director of Scrutiny and Quality or the Director of Governance and Operations. They will then act in accordance with this policy.

Step 3

- 4.3 If these steps have been followed and you still feel you have concerns, or that they have not been addressed, or that you cannot discuss the matter with any of the above then you should contact – the Chief Executive, the Chair or the designated Authority Member (the name and contact details are available on the H drive, in the Human Resources folder, under Raising Concerns at Work).

Raising concerns externally

- 4.4 Where attempts to raise matters internally have been unsuccessful or, exceptionally, if staff feel they cannot raise their concerns internally, you may consider raising the matter with the relevant regulatory authority for example:
- The Health and Safety Executive
 - Financial Services Authority
 - The police
 - The National Audit Office. The Comptroller and Auditor General is a prescribed person under the Act, to whom external persons can make disclosures relating to “***the proper conduct of public business, value for money, fraud and corruption in relation to the provision of centrally-funded public services***”.
- 4.5 You may also want to consider contacting the independent charity Public Concern at Work on 0207 404 6609. Their lawyers can give you free confidential advice at any stage about how to raise a concern about serious malpractice at work. They will also provide advice on the circumstances in which it may be appropriate for you to contact an outside body

5. Additional information

Training

- 5.1 Training and regular updating will be provided for the management team and Authority Member/s with whom concerns may be raised.

Evaluation and review

- 5.2 Training and regular updating will be provided for the management team and Authority Member/s with whom concerns may be raised.

6. Notification

- 6.1 The Audit and Risk committee will be advised of any concerns raised and these will be notified to the Board
- 6.2 Staff will be reminded via staff meetings of their ability to raise concerns and the protection afforded to them by the legislation.

7. Conclusion

- 7.1 This policy is intended to give staff the means and confidence to raise genuine concerns. Raising concerns promotes good management and accountability. The Authority is committed to act appropriately and without delay on information received from any member of staff who is acting in good faith.

Document Control

Version Control

Printed documents are uncontrolled. This document is only valid on the day it was printed.

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1.0	Whistleblowing Policy	September 2008
1.1	Updating of job titles Reapproved by Audit Committee	December 2010
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1.3	Reapproved by Audit Committee	December 2012
2.0	Redrafted after NAO government wide review.	April 2014
2.1	Updated after Annual review to include reference to C & AG as prescribed person	December 2014
2.2	Reapproved by Audit Committee	November 2015

Associated Documentation

Version	Description of Documentation

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