

Whistleblower Policy



1. Introduction

Accountable Now believes that good and open communication between colleagues at all levels throughout the organisation and platform promotes better work practice. Accountable Now seeks to conduct itself with honesty and integrity at all times and expects its staff to act according to the organisation's values. However, we acknowledge that all organisations face the risk of unknowingly harbouring malpractice and for this reason we have a duty to take appropriate measures to identify such situations and remedy them. On this basis, staff are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals. In this regard, Accountable Now will protect them from victimisation and dismissal when concerns are raised in good faith.

2. Authority for whistleblowing policy

The Executive Director is in charge of ensuring colleagues are aware of this policy and that it is followed.

Managers have a specific responsibility to facilitate the operation of this policy and to ensure that staff and volunteers feel able to raise concerns, without fear of reprisals, in accordance with the procedure outlined below. To facilitate this process, the Executive Director and staff will help managers understand the relevant legal and operational framework and best practice.

Staff is responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware.

3. Scope

This policy applies to Accountable Now's employees. Any whistleblowing reports we may receive from employees of Accountable Now's members must be dealt with according to the [Complaints Mechanism](#) we have in place.

Accountable Now has introduced these procedures to enable employees to raise or disclose concerns about malpractice or misconduct in the workplace at an early stage and in the right way, and they apply in all cases where there are genuine concerns, regardless of where this may be and whether the information involved is confidential or not.

The term 'malpractice' includes but is not limited to:

- Criminal offences, including fraud and financial malpractice;
- Breaches of legal obligations (including negligence, breach of contract, breach of administrative law);
- Miscarriages of justice;
- Breaches of health and safety;
- Damage to the environment;

Last updated and approved by the Board on 29 June 2015



- The concealment of any of the above.

If an individual raises a genuine concern and is acting in good faith, even if it is later discovered that they are mistaken, under this policy they will not be at risk of losing their job or suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice.

4. Procedure for raising a concern

If you believe that the actions of anyone (or a group of people) working for Accountable Now do or could constitute malpractice you should raise the matter with your line manager. Where this is not appropriate because the line manager is involved in the alleged malpractice, the matter should be raised with the Executive Director. Where this is not appropriate because the Executive Director is involved in the alleged malpractice, the matter should be raised with the Chair of the Board.

You may raise your concern verbally or in writing and should include full details and, if possible, supporting evidence. You must state that you are using the Whistleblowing Policy and specify whether you wish your identity to be kept confidential.

5. Confidentiality

Every effort will be made to keep your identity confidential, at least until any formal investigation is under way. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep confidential the fact that you have raised a concern, the nature of the concern and the identity of those involved.

There may be circumstances under which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If in our view such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure.

Equally, should an investigation lead to a criminal prosecution, it may become necessary for you to provide evidence or be interviewed by the police. In these circumstances the implications for confidentiality will also be discussed with you.

6. Process for disclosures

All disclosures will be taken seriously, and the following procedure will be used.

- If you have any personal interest in the matter you have raised, you must disclose this at the outset.

Last updated and approved by the Board on 29 June 2015



- Your disclosure will be acknowledged in writing, within 72 hours as long as staff are present in the office, confirming that the matter will be investigated. In the normal course of events Accountable Now will get back to you within two weeks or immediately if it is a serious matter.
- A suitable person will be identified to manage the disclosure. This will be someone who is in a position to take any necessary action as an outcome.
- A suitable individual will be instructed to conduct an investigation into the allegation (they will have had no previous involvement in the matter). The investigation will start within two weeks of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, there will be an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.
- You may be asked to provide more information during the course of the investigation.
- The investigation report will be reviewed by the person managing the disclosure.
- Appropriate action will be taken – this could involve initiating a disciplinary process, or informing external authorities if a criminal action has been committed e.g. fraud or theft. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.
- If it is found that there is not sufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for the manager to take a more informal approach to dealing with the matter.
- You will receive written notification of the outcome of the investigation, though not all the details or a copy of the report.
- Possible outcomes of the investigation could be that:
 - the allegation could not be substantiated; or
 - action has been taken to ensure that the problem does not arise again. You will not, however, be given details about the action taken as this could breach the human rights of the person(s) involved.
- If you are not satisfied with the response you have received you should raise the matter with the Chair of the Board outlining your reasons.
- If you have asked to remain anonymous, care will be taken to respect this request (see section on confidentiality above).
- The Director is required to report, with suitable anonymity, to the Board on all instances of whistleblowing and their resolution.

7. Corrective Action and Compliance

As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigator to enable Accountable Now to minimise the risk of the

Last updated and approved by the Board on 29 June 2015



recurrence of any malpractice or impropriety which has been uncovered. The Executive Director will be responsible for reviewing and implementing these recommendations in the future and for reporting on any required changes to the Board.

8. False Disclosure

Accountable Now will treat all disclosures of malpractice seriously and protect staff who raise concerns in good faith. However, appropriate disciplinary action will be taken in accordance with the Disciplinary Procedure against any employee who is found to have made a disclosure maliciously that they know to be untrue, or without reasonable grounds for believing that the information supplied was accurate. This may result in dismissal.

Last updated and approved by the Board on 29 June 2015