



Ileostomy & Internal Pouch
Association

Registered Charity

Whistleblowing Policy

Date agreed by Board of Trustees	Signature of Chair of Trustees	Date of next review:
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1. Introduction

The Ileostomy and Internal Pouch Association (IA) recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the charity's success ensured.

2. Aim

This policy is designed to provide guidance to those who undertake paid or voluntary work for IA, plus all other stakeholders, including members of the public, who may feel that they need to raise certain issues relating to IA with someone in confidence.

3. Associated policies

This policy should be read alongside the following policies, all of which are available on IA's website and in hard copy format from National Office:

- Complaints Policy
- Safeguarding Policy.

4. Scope

This policy applies to all IA staff (including casual and temporary staff and contractors) and volunteers, plus all other stakeholders, including members of the public.

5. Definition of 'Whistleblowing'

This policy applies where an individual/s reasonably believes that one of the following sets of circumstances is occurring, has occurred, or may occur within IA, and that their disclosure is in the public interest:

- a criminal offence has been committed, is being committed or is likely to be committed
- a person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject
- a miscarriage of justice has occurred, is occurring or is likely to occur
- the health and safety of any individual has been, is being or is likely to be endangered
- the environment has been, is being or is likely to be damaged
- information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

It is not necessary to prove that the breach or failure that is alleged to have occurred or is likely to occur and a reasonable suspicion may simply be raised. However, it should be noted that an individual who makes such as disclosure (hereinafter referred to as a 'whistle-



blower') will not be protected from the consequences of making such a disclosure if, by doing so, a criminal offence is committed.

6. Examples of qualifying disclosures

Some example of qualifying disclosures in the charity sector context may include:

- Fraudulent acts (e.g. manipulation of accounting records/finances, inappropriate use of funds, decision making for personal gain, abuse of position to influence decisions)
- Breaches of acceptable professional and ethical standards
- Breaches of IA's Health, Safety and Wellbeing policy, entailing danger to members, staff or associated personnel.

7. Making a disclosure

If an individual/s believes any of the practices outlined under item 4 (Definition of Whistleblowing) are happening within IA, the following procedure should be followed:

The issue/s should be raised with the individual's line manager or IA branch or affiliate organisation's committee representative, who will treat the matter in confidence. If it is not appropriate for the individual to raise the issues with their line manager or IA branch or affiliate organisation's committee representative, they should raise the issue with a more senior member of management or, if not possible, another member of management at the same level.

8. Investigation

In the event of a disclosure being made it is likely that an investigation will be necessary and the whistle-blower may be required to attend an investigatory meeting as a witness. At the investigation meeting the whistle-blower will need to explain fully the nature and extent of what they believe the problem to be. The whistle-blower may bring a colleague to help them explain the situation more clearly if desired.

9. Outcome of the investigation

Depending on the nature of the complaint, it may not be possible to find an immediate solution, but the concerns will be investigated as quickly as is reasonably possible, and, where possible, providing such disclosure does not breach confidentiality, the whistle-blower will be advised of the outcome of the investigation in due course. As a minimum they will be advised when any investigation has been completed and that appropriate action has been taken, although they may not be informed of the specific details of the action that has been taken.



10. Further action

If dissatisfied with the outcome of this procedure, the whistle-blower may raise the matter with a more senior member of the Management Team. If they remain dissatisfied with the outcome they have the right to express their concerns to the relevant Prescribed Person designated by the Public Interest Disclosure (Prescribed Persons) Order 2014, or any statute or statutory instrument which subsequently supersedes this legislation. If they reasonably believe that the relevant failure as listed in any of the above practices relates wholly or mainly to the conduct of a person other than someone within IA, or any other matter for which a person other than IA has legal responsibility, they should make that disclosure to that other person.

If the whistle-blower considers that they have an interest in the matter and, despite the best efforts of IA, they believe that disclosure within IA is inappropriate or as noted previously has been unsuccessful, a disclosure may also be made to Public Concern at Work, the leading authority on public interest whistleblowing. Disclosures made to legal advisors in the course of obtaining legal advice will be protected.

11. Criminal issues/fraud

In the event of the allegation being of a very serious nature, for example relating to a fraud or other potential gross misconduct offence, there is likely to be a need to involve IA's auditors, the Charities Commission and/or the police or other appropriate authorities.

It is the responsibility of the IA's trustees to decide whether an incident is significant and should be reported.

12. Protecting whistle-blowers

Where it is necessary for the disclosure and the investigative meeting minutes to be supplied to an employee as part of the evidence supporting disciplinary action against them, appropriate steps will be taken to ensure that the whistle-blower's working environment and/or working relationships are not prejudiced by the fact of the disclosure.

A whistle-blower will not under any circumstances be subjected to any form of detriment or disadvantage as a result of having raised their concerns. The victimisation or harassment of an individual making a protected disclosure is a disciplinary offence.

13. Malicious disclosures

If any disclosure concerns information which the whistle-blower does not substantially believe is true or is made in bad faith (for instance in order to cause disruption within IA), or indeed if the disclosure is made for personal gain, the whistle-blower may become subject to action under the disciplinary procedure, which could include dismissal. Whilst IA hopes that such disclosures will never be necessary, it also recognises that it may find itself in such circumstances and each case will be treated on its own facts.



14. Data protection

When a whistle-blower makes a disclosure, IA will process any personal data collated in accordance with the Data Protection Act 2018. Data collected from the point at which the individual makes the disclosure is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.