

Co-operative Assistance Network Limited

Whistleblowing Policy

Introduction

The word whistleblowing in this Policy refers to the disclosure internally or externally by workers of malpractice, as well as illegal acts or omissions at work. This policy and procedure has been written to take account of the Public Interest Disclosure Act 1998, which protects workers making disclosures about certain matters of concern, where those disclosures are made in accordance with the Act's provisions. The Act is incorporated into the Employment Rights Act 1996, which also already protects employees who take action over, or raise concerns about, health and safety at work.

Policy statement

CAN is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices. To achieve these ends, it encourages freedom of speech. It also encourages staff to use internal mechanisms for reporting any malpractice or illegal acts or omissions by its directors, members or workers. CAN will not tolerate any harassment or victimisation of a whistleblower (including informal pressures), and will treat this as a serious disciplinary offence, which will be dealt with under the Disciplinary Procedure

Procedure

1. Other policies and procedures

CAN has a range of policies and procedures, which deal with standards of behaviour covering Customer Care, Equality and Discrimination. Members are encouraged to use the provisions of these procedures. There may be times, however, when the matter needs to be handled in a different way. Examples:

- Malpractice or ill treatment of a client/customer by another member
- A criminal offence has been committed, is being committed or is likely to be committed
- Suspected fraud
- Disregard for legislation, particularly in relation to health and safety
- The environment has been, or is likely to be, damaged
- Breach of financial procedures
- Showing undue favour over a contractual matter
- A breach of the CAN code of conduct
- Information on any of the above has been, is being, or is likely to be concealed

This list is not exhaustive.

2. Designated officers

The Society Secretary and The Chair of the Quality Committee are designated officers for concerns under this procedure. Either designated officer is a point of contact for members or workers who wish to raise concerns under the provisions of this policy. Where concerns are raised they will arrange an initial interview, which will, if requested, be confidential, to ascertain the concern(s). At this stage, the whistleblower will be asked whether they wish their identity to be disclosed and will be reassured about protection from possible reprisals or victimisation. They will also be asked whether or not they wish to make a written or verbal statement. In either case, the designated officer will write a brief summary of the interview, which will be agreed by both parties. The designated officer will report to Directors

3. Directors

Directors will be responsible for judging whether an investigation is required and the personnel who will carry that out. They may decide to use outside specialists as a part of that team.

4. The investigation

The investigation may need to be carried out under the terms of strict confidentiality i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. This may be appropriate in cases of suspected fraud. In certain cases, however, such as allegations of ill treatment of clients/ customers, suspension from work may have to be considered immediately. Protection of clients/customers is paramount in all cases.

5. Following the investigation

The directors will review the results of the investigation.

If there are lessons to be learned concerning corporate policies or procedures they will institute a process of improvement.

If there has been any damage or loss to any individual internal or external or to any organisation they will institute a process of disclosure, rectification and/or compensation

If the result of the investigation is that there is a case to be answered by any individual, the Directors will institute a process using the Disciplinary Procedure. Where there is no case to answer, but the whistleblower held a genuine concern and was not acting maliciously, the designated officer will ensure that the member suffers no reprisals. Where false allegations are

made maliciously, Directors may consider it appropriate to act against the whistleblower through the Disciplinary Procedure.

The designated officer will arrange a meeting with the whistleblower to give feedback on any action taken. (This will not include details of any disciplinary action, which will remain confidential to the individual concerned).

If the whistleblower is not satisfied with the outcome of the investigation, CAN recognises the lawful rights of whistleblowers to make disclosures to authorities such as the Health and Safety Executive, the Financial Conduct Authority, the Police, Safeguarding services etc.

Responsible Department: Society Secretary

Implementation Date: 17 December 2015

Review period: 5 years

Next review due: 30 April 2023

Agreed at Directors Meeting of 03 June 2015

Passed at Members Meeting of 17 December 2015