

Whistle-Blowing Policy

1. Introduction

This policy applies to all C na G staff. It sets out staff responsibilities to raise work concerns that relate to unlawful conduct, financial malpractice or impropriety, including fraud. C na G defines fraud as *the use of deception with the intention of obtaining an advantage, avoiding an obligation or causing loss to another party*. The purpose of this policy is to ensure that staff concerns are raised at an early stage and dealt with in an appropriate manner. The policy should be considered alongside C na G's Anti-fraud policy and Fraud Response Plan.

2. Staff Protection

C na G is committed to protecting any member of staff who raises a genuine concern about something happening in the C na G workplace. As long as a member of staff is acting in good faith and in accordance with this policy, it does not matter if they are mistaken. C na G staff will not risk losing their job, nor will they suffer any detriment as a result of raising a concern they believe is genuine. C na G will not tolerate harassment or victimisation of anyone raising a genuine concern.

3. Confidentiality

If a C na G staff member requests that their identity be protected, C na G will take all possible steps to prevent their identity becoming known. Should the situation arise where it is not possible to resolve the concern without revealing the member of staff's identity (for example, if evidence is needed in court) the best way to proceed will be discussed with the member of staff concerned.

4. Concerns Raised Anonymously

Staff should understand that it is difficult for C na G to investigate concerns raised anonymously or to give protection or feedback. Therefore, whilst C na G will consider anonymous reports, this policy does not cover matters raised anonymously.

5. How Concerns will be Handled

Once a staff member has informed C na G of a concern, this will be examined and a decision made about what action to be taken. This may involve an internal enquiry or a more formal investigation. The member of staff will be told who is handling the matter, how they may contact this person and whether or not any further assistance is needed.

6. How to Raise a Concern

Section 5 of C na G's Anti-fraud policy gives full information about what to do if fraud is suspected. These steps should be followed not only for concerns about fraud and also for any other concern where a member of staff feels the need to 'blow the whistle'.

7. Independent Advice

Sometimes staff may feel the need to take independent advice. There may be circumstances where they are unsure whether or not to avail of the C na G arrangements for 'whistle blowing'. They may not be sure whether or not their concern is personal or one of public interest. It may be that having raised a concern they feel the need for reassurance through taking independent advice.

Help is available from the independent charity Public Concern at Work Telephone 020 74046609. Their lawyers can give free confidential advice at any stage about how to raise a concern about serious malpractice at work. Public Concern at Work can also give advice on the circumstances in which a member of staff should contact an outside body rather than raise a matter internally. You are recommended to visit their website at www.pcaaw.co.uk to find out the full range of services available. Staff can, of course, also seek advice from a lawyer of their own choice at their own expense.

8. Protection Under the Law

The Public Interest Disclosure (Northern Ireland) Order 1998 provides remedies for workers who are dismissed or subject to detriment for making disclosures. What this means is that if you 'blow the whistle' in certain circumstances, you are afforded legal protection. More information about this is given in C na G's Anti-Fraud Policy.

9. Matters Raised Maliciously

Members of staff who maliciously raise a matter that they know to be untrue may be subject to disciplinary action.

10. Comments on this Policy

Should you have any comments on or queries about this policy, you are invited to contact the Senior Administration and Personnel Officer.