



WHISTLEBLOWING

POLICY

IASIO is committed to achieving and sustaining high standards with regard to behaviour at work, service to our clients and the public, and in all its working practices. All staff and agents of IASIO are therefore expected to conduct themselves with integrity, impartiality and honesty at all times.

IASIO seeks to foster a climate of openness and a culture where it is safe and acceptable to raise concerns about inappropriate behaviour at any level of the organisation. To achieve this aim, IASIO wishes to encourage employees to report genuine concerns without fear of reprisal or victimisation.

Purpose

The principal emphasis of this policy is to ensure that action is taken to investigate any matters of concern raised by staff and to enable IASIO to initiate corrective action where deemed necessary and appropriate.

The policy is intended to provide a mechanism to address issues which are not already provided for within existing policies, e.g. policy on Harassment, Grievance Procedure, Theft, and Fraud. This policy is not intended to substitute for those policies or other normal management reporting mechanisms which are already in place within IASIO.

Scope of the Whistleblowing policy

You should first decide whether the matter is best reported through your line manager or alternatively to the Chief Executive. The Whistleblowing Policy is designed to ensure that concerns around issues that are in the public interest are raised with an appropriate officer of IASIO so that they can be dealt with effectively and in a spirit of openness.

If you feel that reporting through these normal management channels is not possible or inappropriate to the issue involved, you should contact the Chair of the Board Audit Committee, currently this is John Trethowan who can be contacted on 0879007052 or email j.trethowan@gmail.com

The Whistleblowing Policy should be followed if an employee reasonably believes that a problem has occurred, or is in the process of occurring, or likely to occur, and cannot be raised with either your line manager or the Chief Executive.

Concerns raised should be factual (to the best of the persons knowledge) and should cover the following:

- What has occurred (or thought to have occurred)
- When it occurred
- Where it occurred
- Who was involved
- Have prisoners, probation service clients, staff or the public been put at risk as a result
- Has it happened before
- Are there any other witnesses
- Is there any supporting information
- How the matter came to light
- Has it been raised with anyone else? If so, details of when/who.

Such concerns should be raised at the earliest opportunity in order for IASIO to investigate the matter. Inevitably some concerns will be genuinely misconceived because, for example the full facts have not emerged.

A disclosure to the employer will be protected if the whistleblower has an honest and reasonable suspicion that the malpractice has occurred, is occurring or is likely to occur. However, it should be noted that the malicious raising of unfounded allegations will be treated as misconduct and may lead to disciplinary action.

How to raise Concerns

Concerns may be raised verbally, in writing. Employees are encouraged to raise concerns internally at work through their manager in the first instance. Where this is not appropriate the employee should contact IASIO's Chief Executive Officer. If the concern surrounds the Chief Executive Officer another IASIO Director, it should be reported to the Chair of the Audit Committee.

Confidentiality and anonymity

Whilst it is possible to raise such matters anonymously staff should not feel inhibited in identifying themselves. If staff request that their identity should not be disclosed, the organisation will not disclose it without consent. If the situation arises where a concern cannot be investigated or resolved without revealing the employee's identity, or if there is a legal imperative to disclose the identity, IASIO will discuss this with the employee and decide how the issue will be progressed.

See appendices attached.....

Appendix 1 – Employer checklist

- Does your organisation have a whistleblowing policy in place?
- Is the policy supported by an open and transparent culture which encourages the raising of concerns?
- Are workers made aware of the policy?
- Is training provided on the content of the policy?
- Is there evidence of clear and explicit management commitment from the top of the organisation to an open and honest culture?
- Is there a code of conduct in place that reinforces the expectation of ethical behaviour from workers at all levels?
- Are there clear procedures and lines of reporting for workers wishing to raise concerns, perhaps using a flowchart or diagram for clarity?
- Are there clear roles and responsibilities in place for handling concerns raised?
- Does the policy offer alternative ways of raising concerns, including externally?
- Is there a specialist resource with detailed knowledge of whistleblowing who can provide advice to management and staff and be an alternative route for raising concerns?
- Is there effective awareness training for all staff so they know what concerns they can raise and how to raise them?
- Is there effective training for line managers who may have to deal with concerns?
- Is there continuing communication of your organisation's commitment to an open and ethical culture, through circulars, posters, emails and your intranet?
- Are there regular attitude surveys to determine the level of confidence staff have in arrangements for raising concerns?
- Does the whistleblowing policy make clear that your organisation will not tolerate harassment of anyone raising a genuine concern?
- Does the policy direct workers to available sources of support and advice, for example Public Concern at Work or a union?
- Are practical steps taken to protect the confidentiality of workers raising concerns?
- Do you have a plan in place should an investigation be required e.g. access to trained fraud investigators?
- Do you have adequate systems in place for recording, monitoring and reporting on whistleblowing caseload?

Appendix 2 - A Strong Policy

A National Audit Office review into Government (UK) whistleblowing policies (published January 2014) highlighted key criteria for a successful whistleblowing policy:

- Commitment, clarity and tone from the top

Guidance should make clear that any concerns are welcomed and will be treated seriously. Guidance should reassure the reader who may be thinking of raising a concern that the organisation's leadership will take the concern seriously and will not punish the employee if the concern turns out to be untrue, as long as they had reasonable suspicion of wrongdoing.

- Openness, confidentiality and anonymity

Guidance should make sensible and realistic statements about respecting whistleblowers' confidentiality. Guidance should also outline the potential issues that could arise from employees reporting concerns anonymously.

- Offering an alternative to line management

Concerns may relate to behaviours of line management, or employees may be unwilling to discuss concerns with immediate management. Alternative channels inside the organisation should be offered.

- Structure

It is important that guidance is easy to use so that readers are clear about how they should raise concerns. The policy should cover all areas expected under best practice. It should be clear, concise and avoid including irrelevant detail that might confuse readers. Flow charts or similar pictorial and diagrammatic representations that outline the step by step process are useful techniques to support a well laid out policy.

- Access to independent advice

Employees may need advice where they feel unsure or unaware of how to raise a concern. Guidance should indicate where employees can seek advice, e.g. Public Concern at Work

- Whistleblowing to external bodies (prescribed persons)

Guidance should make employees aware of how they can raise concerns outside the department, e.g. to an external auditor or regulator. This is an obligation for officials in certain circumstances, for example where there is evidence of criminal activity.

- Reassuring potential whistleblowers

Guidance should make clear that it is an offence for management and staff to victimise employees thinking of making a complaint. Similarly, it should make clear that employees who deliberately raise malicious and unfounded grievances will be subject to disciplinary action.

- Addressing concerns and providing feedback

Whistleblowing policies should set out procedures for handling concerns. This should reassure employees that their concerns will be taken seriously and will ensure that instances of malpractice are identified and dealt with appropriately.

But remember, a strong policy is of little value if it is not supported by an open, transparent and supportive culture in which concerns can be raised without fear.