



**The British
Psychological Society**

Promoting excellence in psychology

WHISTLEBLOWERS POLICY

For use by	All Society employees
Owner	Director of Finance
Date of Approval by Personnel Committee	12 September 2012
Dates of Trade Union Consultation and Negotiation	5 October 2012
Date of Approval by JNC	5 October 2012
Date of Trade Union Ballots	
Launch Date	January 2013
Contact – Comments	Personnel Department
Review Date	First year review, then every three years (2014/2017)

1. Introduction

- 1.1. The Society aims to conduct its activities not only within the law, but also with fairness and integrity. It wishes to create a working environment within which individual employees feel able to bring to the attention of the organisation, concerns about particular incidents of wrongdoing, or other suspected malpractice, without fear of criticism or future discrimination.
- 1.2. Whistleblowing occurs when an employee or worker provides certain types of information, usually to the employer or a regulator, which has come to their attention through work. The whistleblower is usually not directly or personally affected by the danger or illegality, although they may be. Whistleblowing is therefore 'making a disclosure in the public interest' and occurs when a worker raises a concern about danger or illegality that affects others, for example members of the public. The statutory framework is covered by the Public Interest Disclosure Act 1998, <http://www.legislation.gov.uk/ukpga/1998/23/contents>.
- 1.3. Members of staff are encouraged to speak out and report any such wrongdoing or malpractice by other members of staff or Members of the Society engaged in Society activities, as outlined in the following policy.
- 1.4. This policy should be read in accordance with the following:
 - Anti-fraud Policy
 - Anti-bribery Policy
 - Financial Procedures and Internal Control Manual *
 - Declaration of Interest – Guidance and Procedures
 - Gifts and Hospitality
 - Anti-Money Laundering Policy
 - Disciplinary Policy and Procedure *
 - Grievance Policy & Procedure *
 - Member Conduct Rules

*** *update/approval ongoing***

2. Aims

The aims of the Whistleblowers Policy are:

- 2.1. To support a culture of openness and integrity.
- 2.2. To ensure that individuals who, with good cause, suspect others of wrongdoing can raise their concerns without fear or reprisal.

3. Scope

- 3.1. This Policy applies to any employee, permanent or temporary, who reports, in good faith, a concern with respect to another employee or Society Member that:
- a criminal offence has been, is being, or is likely to be committed;
 - there has, is or is likely to be a failure to comply with legal obligations;
 - unethical behaviour, malpractice or wrong doing of any description has been, is being or is likely to have taken place;
 - the health or safety of an individual has been, is being, or is likely to be endangered;
 - the working environment has been, is being or is likely to be damaged;
 - information that proves that any matter falling within the above has been, is being or is likely to be deliberately concealed.

This Policy will also apply to the reporting of the persistent and deliberate avoidance of agreed policies and procedures, and of any breaches of the Society's policy on Dignity at Work.

4. Raising a concern

- 4.1. If you wish to raise a concern, the earlier it is done the better. Every incident will be treated sensitively and will be fully investigated.
- 4.2. In the first instance, you should speak to your line manager. If your concern relates to actions of your line manager you should speak to your Department Director. If your concern relates to actions of your Department Director or a Member of the Society you should speak to the Chief Executive. If your concern relates to actions of the Chief Executive you should speak to the Honorary General Secretary.
- 4.3. Whoever is approached will ensure that the matter is investigated within the relevant personnel or member conduct procedures, taking advice from appropriate colleagues as necessary and in confidence.
- 4.4. The Society encourages employees to raise any concerns via this process however, if you feel you wish to raise concerns outside the line management or Trustee structure, this can be done through Public Concern at Work. (Please note that concerns raised outside of this policy would not offer the individual the same level of protection provided by the Whistleblowers Policy.) Their contact details are as follows:

Telephone: 0207 404 6609 or at www.pcaw.co.uk

5. Confidentiality and disclosure

- 5.1. The Society recognises the sensitivity of raising such issues and undertakes to treat details of individuals who report matters with the utmost confidence. This means that your identity will not be disclosed without your permission and unless it is absolutely necessary to do so in connection with the investigation of the disclosure.

- 5.2. Provided that the disclosure is made in good faith, and you have genuine cause for concern, no action will be taken against you.
- 5.3. Any attempt by any Member or employee to deter an individual from making a disclosure, victimising them or making life difficult for them because of a disclosure, perceived or actual, will be considered as a disciplinary offence.

6. Who may not be protected

6.1. Any individual who:

- does not make a disclosure in good faith;
- has made the disclosure principally for the purpose of obtaining payment or personal gain;
- uses this procedure maliciously;

will not be protected and will incur action under the Society's Disciplinary Policy and Procedures.