



## **Whistleblowing Policy and Procedure**

### **Aims of this Policy**

Pillar Kincardine requires Directors of the Board, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. It is important that any criminal behaviour or other wrongdoing by an employee, or any individual undertaking work with the organisation is reported and properly dealt with.

This Whistleblowing Policy is underpinned by the Public Interest Disclosure Act 1998 (known as the Whistleblowers Act). This gives legal protection to employees against being dismissed or penalised by their employers as a result of disclosing certain serious concerns. Pillar Kincardine is committed to ensuring that no member of staff should feel at a disadvantage in raising legitimate concerns.

As employees and representatives of Pillar Kincardine we must practise honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Scope of the Policy**

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to other procedures e.g. disciplinary.

These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Law
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

### **Confidentiality**

Pillar Kincardine will treat all such disclosures of concern in a confidential and sensitive manner. The identity of the employee making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

## **Reporting Responsibility**

This Whistleblowing Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Pillar Kincardine can address and correct inappropriate conduct and actions. It is the responsibility of the Board of Directors, employees and volunteers to report concerns over Pillar Kincardine services or governance.

## **No Victimisation**

It is contrary to the values of Pillar Kincardine for anyone to retaliate against any Board member, employee or volunteer who in good faith reports a concern at Pillar Kincardine. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

## **Reporting Procedure**

Pillar Kincardine has an open door policy and employees, Board members and volunteers should share any concerns or complaints with the Service Manager in the first instance. If they are not comfortable speaking with the Service Manager or are not satisfied with her/his response, they should speak with the Chair of the Board of Directors of Pillar Kincardine. Employees, Board members and volunteers may also submit their concerns in writing directly to the Chair of the Board of Directors of Pillar Kincardine, who will notify the Service Manager that a complaint has been received.

## **Handling of Reported Violations**

The Service Manager is required to record all complaints or concerns and to report these to the Chair of the Board of Directors of Pillar Kincardine. The Chair will notify the person who submitted the complaint and acknowledge receipt of their concerns, and will advise the Board of Directors of the complaint and its resolution. Pillar Kincardine will ensure that an investigation takes place and make an objective assessment of the concern. The employee will be kept advised of the progress and Pillar Kincardine will ensure the action necessary to resolve the concern is taken.

## **Compliance Officer**

The Chair of Pillar Kincardine is responsible to the Board of Directors for ensuring that all complaints are promptly and adequately investigated, and that appropriate corrective action has been taken if warranted by the investigation.

## **Accounting and Auditing Matters**

The Pillar Kincardine Service Manager and/or Office Manager shall immediately notify the Chair and Treasurer of any concerns or complaint regarding accounting practices, internal controls or auditing, and work with the Chair and Treasurer until the matter is resolved.

## **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegation that proves not to be substantiated and which proves to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.