

## WHISTLEBLOWING POLICY FOR NON EMPLOYEES

Original creation date	NEW
Last review date	April 2018
Next review date	April 2020
Related policies	<p>Health &amp; Safety Policy</p> <p>Data Protection Policy</p> <p>Safeguarding Policy</p> <p>Child Protection Policy</p> <p>Complaints Policy</p>
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Approved by	Council

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*This policy is for use by volunteers or members of the Association or members of the public who want to tell the Association or another third party about wrongdoing or malpractice involving the Association.*

### 1. Policy Statement



- 1.1. The RAF Association is committed to conducting its work with honesty and integrity and it expects employees and volunteers, including Area and Branch officials to maintain high standards of personal and professional behaviour. We encourage a culture of openness and accountability to discourage and prevent illegal or unethical conduct. It is important that any fraud, misconduct or wrongdoing by employees or others working on behalf of the Association is reported and properly dealt with.
- 1.2. The Association recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Association actively encourages its volunteers, members, beneficiaries, supporters or members of the public to report wrongdoing as soon as possible and will take concerns raised seriously and investigate them appropriately.
- 1.3. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees and others working on behalf of the Association should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- 1.4. This policy sets out the way in which volunteers, members, beneficiaries, supporters or members of the public may raise any concerns that they have and how those concerns will be dealt with. Employees should refer to the Association's separate Whistleblowing Policy for Employees.
- 1.5. If employee misconduct is discovered as a result of an investigation under this procedure, the Association's disciplinary procedure will be used. Misconduct by a volunteer or Area or Branch Official will be dealt with under separate procedures. Appropriate external measures may also be taken by the Association.
- 1.6. An instruction to cover up wrongdoing is itself unacceptable conduct. If told not to raise or pursue any concern, even by a person in authority, you should not agree to remain silent. You should report the matter to one of the following:-

- 🎯 Director of HR and Volunteering
- 🎯 Director of Governance and Risk

If you have concerns about the possible involvement of either of the above, you should raise your concern with:

- 🎯 The Secretary General
- 🎯 Chair of Council

## Council Lead for Whistleblowing

1.7. If you can not go to the Association with the concern first, you should contact a prescribed person or body (see “Additional Resources” for further information.)

### **2. Procedure**

2.1. This is a formal procedure which should be used where there are genuine concerns that the Association and / or anyone acting on its behalf or in its name is acting unlawfully or unethically. No one will be victimised for raising a genuine concern under this policy.

2.2. This policy does not relate to personal complaints which should be raised under the Association’s Complaints Procedure.

2.3. Concerns should be raised in writing (including by email) with the Director of HR & Volunteering, failing whom the Director of Governance and Risk. In the event that the individual has concerns about their possible involvement, the concern may be raised with one of the individuals named in paragraph 1.6.

2.4. There are other options if an individual does not want to report their concern to the Association, e.g. legal advice from a lawyer, or tell another body (see section 6).

2.5. Individuals are encouraged to report wrongdoing as soon as possible. The Association is committed to taking concerns seriously and investigating them appropriately.

### **3. Reporting A Concern Anonymously or Confidentially**

Individuals can give their name but request confidentiality – the Association (or other body) will make every effort to protect your identity. You can tell the Association or another body anonymously but this may prevent or restrict any subsequent investigation if the individual hasn’t provided all the information needed.

### **4. Action Following Reporting**

4.1. On receipt of a concern the Director of HR & Volunteering, or Director of Governance & Risk will arrange an investigation of the matter.

4.2. Depending on the outcome from the investigation, disciplinary proceedings against the wrongdoer may be commenced and the issue reported to external

enforcement agencies. While the Association hopes that such disclosures will never be necessary, it also recognises that it may find itself in circumstances which are new to it and each case will be treated on its own facts.

4.3. Concerns reported under this policy cases will be reported to the Audit Committee and Council and any appropriate government department or regulatory agency.

4.4. The Association can keep an individual informed about the action it has taken, but it can't give any detail if it has to keep the confidence of other people.

## 5. Next Steps if Unsatisfied

If you are not satisfied with the way the Association has handled your concern you can contact the Secretary General directly or one of the bodies listed in section 6 or if you believe their concern wasn't taken seriously or the wrongdoing is still going on.

## 6. Additional Resources and Contacts

Charity Commission

<https://www.gov.uk/government/publications/complaints-about-charities/complaints-about-charities>

Office of Scottish Charity Regulator

<https://www.oscr.org.uk/about-charities/raise-a-concern>

CQC

<http://www.cqc.org.uk/contact-us/report-concern/report-concern-if-you-are-member-public>

Fundraising Regulator

<https://www.fundraisingregulator.org.uk/make-a-complaint/complaints/>

ICO

<https://ico.org.uk/concerns/>