



**FAMILIES NEED
FATHERS**

Whistleblowing Policy

Families Need Fathers (FNF) expects its employees, trustees and volunteers (e.g. branch officers and helpline facilitators) to achieve and maintain high standards of professionalism across the organisation. However, in any organisation it is possible to come across instances where such standards are not met or where malpractice may have occurred.

This policy therefore outlines the process by which any employee, volunteer, sessional worker, work experience student, trustee or a member of FNF can safely report any aspect of organisational activity that has caused them concern and which cannot be addressed through normal line management channels or managed via use of other policies, specifically the organisation's discipline and grievance procedures.

Why we need a policy

FNF encourages everyone who has genuine concerns about malpractice to speak out. Employees and other workers (for example sessional staff, volunteers and trustees) are often the first to realise that there may be something seriously wrong. However, they may not express their concerns because they feel that speaking out would cause friction with commissioners or employers. They may also fear harassment or victimisation. In these circumstances it is often easier to ignore the concern rather than report what may just be a suspicion of malpractice.

Where employees, trustees, volunteers and members fail to report their suspicions to FNF they are abdicating their responsibilities and may become implicated in the wrongdoing. Such a situation would be treated seriously and may, depending on the merits of the case, lead to disciplinary or court action being taken. We all have a vital role to play in implementing and supporting this policy and FNF expects that all will co-operate with this policy and any investigation.

This policy supports the Public Interest Disclosure Act 1998. The Act applies to public, private and voluntary organisations. Its aim is to ensure that any genuine concerns about potential malpractice can be raised and that: -

- Where a complaint is raised internally, it will be properly investigated
- The complainant will receive protection and support
- Appropriate action will be taken.
- Finally, where appropriate the complainant can raise their concerns outside the organisation.

In line with recommendations within the Public Interest Disclosure Act, this policy is intended to encourage and enable all to raise serious concerns within FNF.

Principles

FNF places great importance on identifying and remedying malpractice within the organisation and any allegation or disclosure will be taken seriously and investigated promptly. Acts of malpractice targeted by legislation as unacceptable are:

- criminal offences
- failure to comply with a legal obligation
- a miscarriage of justice
- the endangering of an individual's health and safety
- damage to the environment
- deliberate concealment of information relating to any of the above.

Any attempt by an employee, trustee, volunteer or member to intimidate or victimise a colleague who wishes to raise a legitimate concern about malpractice will be treated as a disciplinary offence. Likewise, any false or malicious allegation made against another person will be dealt with according to the disciplinary procedure.

Disclosures will, in the first instance, be treated confidentially and anonymity will be respected. If however, anonymity has to be broken later in order to successfully complete an investigation, advice and support will be given to the employee, trustee, volunteer or member who raised the concern.

Employee - How to raise a concern

Stage 1

- If possible, any concerns about malpractice should be raised first with your line manager. If this is not possible however because your line manager is unavailable or your concern involves your line manager, then you should discuss your concern with the CEO or a member of the Senior Management team, or, if your complaint involves them, a Trustee.

Stage 2

- Once an allegation has been recorded, the manager will instigate an investigation to determine whether the allegation can be substantiated.

Stage 3

- If the allegation is substantiated then the investigating manager will ensure that any action necessary to resolve a concern is taken. This may involve invoking the organisation's disciplinary procedure or reporting the disclosure to the relevant authority (Police, HSE etc).
- The investigating manager will offer any employee making an allegation full and appropriate support and will keep them informed of the progress of the investigation.

Stage 4

- At the end of the investigation the employee will be informed of the outcome and what action has been taken.

Trustee, volunteer and member - How to raise a concern

Stage 1

- The concerned trustee, volunteer or member should first approach the CEO, or, if the concern relates to the CEO, the Chair of the Trustees either verbally, via email or in writing.
- If they so choose, a friend or a colleague may be involved by the person raising the concern, providing that person is not involved in the investigation.
- The CEO and/or the Chair of the Trustees must help to create a climate where individuals raising concerns feel able to talk in confidence without the threat of recrimination.
- The CEO and/or Chair of the Trustees will identify the nature of the issue by undertaking a preliminary investigation.

Stage 2

- If stage 1 of the investigation and any resultant action does not resolve the matter or if a concern involves the CEO and/or Chair of the Trustees the concern should be raised with the Chair of the Trustees (in the case of it relating to the CEO) or FNF (in the case of it relating to the Chair).
- The case will then be referred to a designated person, who will arrange a meeting in person or by telephone with the person who raised the concern/s to give feedback and be the point of contact under this policy.
- This will, if requested, be confidential to ascertain the areas of concern. At this stage the person raising the concern will be asked if s/he wishes his/her identity to be disclosed and will be reassured about protection from possible victimisation.
- The designated person representing the charity will write a brief summary of the interview, which will be agreed by both parties.
- The designated person will report to the CEO, Chair of Trustees or Trustees as appropriate.

Stage 3

- If the concern raised is very serious or complex, a formal investigation may be held.
- The investigation may need to be carried out under the terms of strict confidentiality i.e. by not informing the subject of the complaint until it becomes necessary to do so.
- In certain cases, however, such as allegations of ill-treatment of people, communication of this information to the subject's professional organisation, place of work or branch may have to be considered immediately. Protection of persons is paramount in all cases.
- The designated person will offer the person raising concerns to be kept informed about the investigation and its outcome.

- If the result of the investigation is that there is a case to be answered by any individual, FNF's Grievance and Disciplinary Policy will be used and the details discovered by formal investigation, transferred to that process.
- Where there is no case to answer, but the member held a genuine concern and was not acting maliciously, the designated person will ensure that member suffers no reprisals.
- If there is no case to answer but there is evidence that a trustee, volunteer or member made an allegation frivolously, maliciously or for personal gain, disciplinary action will be taken against them.

How Families Need Fathers will respond to your complaint

FNF will respond to all concerns and all allegations will be investigated thoroughly.

Within seven working days of a concern being received, either the person to whom the concern has been raised, or the Investigating Officer will write to you to: -

- Acknowledge that the concern has been received;
- Advise whether more information is required or arrange a confidential meeting in person or by telephone;
- Indicate how they propose to deal with the matter;
- Give an estimate of how long it is anticipated it will take to provide a final response if this is possible to determine at the outset;
- Advise whether further investigations will take place and if not, why not.

FNF accepts that those raising concerns need to be assured that the matter has been properly addressed. You will therefore be informed of the outcome of any investigations providing there are no legal or other disclosure restrictions.

Confidentiality

All concerns will be treated in confidence and FNF will make every reasonable effort not to reveal your identity. Anybody involved in an investigation under the scope of this policy must maintain confidentiality – failure to do so will be treated as a disciplinary offence. At the appropriate time, either during the investigation or at the conclusion, you may need to come forward as a witness and will be given assistance and support to help you.

Anonymous Allegations

This policy encourages you to put your name to an allegation whenever possible and FNF will do its best to protect your identity.

Concerns expressed anonymously are much less powerful and are often more difficult to investigate. However, these will be considered at the discretion of FNF. In exercising this discretion the factors to be taken into account would include:

- The seriousness of the issues raised;

- The likelihood of being able to confirm the allegation from attributable sources.

Allegations with no foundation

If you make an allegation in good faith, in accordance with the terms of the Public Interest Disclosure Act, but it is not confirmed by the investigation, no action will be taken against you.

If, however, you make an allegation which FNF considers not to be in line with the spirit of the Public Interest Disclosure Act e.g. to be frivolous, malicious or for personal gain, disciplinary or legal action may be taken depending on the circumstances of the case.

Monitoring the Effectiveness of the Policy

The CEO has overall responsibility for the maintenance and operation of this policy. That officer maintains a central record of concerns raised and the outcomes, but in a form, which does not endanger confidentiality. Monitoring reports will be presented as necessary to Trustees to identify any trends and areas for improvement. However, any reports will maintain the confidentiality of their source.

The CEO may also decide that it is appropriate for the Trustees to be directly involved in overseeing any investigation on behalf of FNF in an attempt to satisfactorily resolve a complaint. In doing so it is hoped to avoid the need for a complaint to be raised unnecessarily outside of FNF.

Investigating Officer

The designation of the Investigating Officer will be the responsibility of the CEO, with the exception of the situations covered in the following paragraphs.

In the event of the allegation being about the conduct of the CEO or a trustee the Investigating Officer will be the Chair of the Trustees.

In the event of the allegation being about the conduct of the Chair of the Trustees, the Investigating Officer will be the Chair of the Governance Committee.