

Policy Name	
Raising Organisational Concerns (Whistleblowing)	
Policy Owner	Policy Author
People Director	Simon Matthews Corporate Quality and Compliance Manager
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Frequency of Review	Version Number
Every 3 years	2.1

Reason for Policy

Having a clear approach to whistleblowing is critical to enabling any organisational concerns to be raised effectively and handled appropriately.

Objective of Policy

To set out the grounds for raising organisational concerns and the principles by which they will be responded to by the RNLI.

Scope

All RNLI workers (i.e. employees, agency and casual workers, contractors, trainees and placement students), and volunteers.

Policy

1. Definitions

Whistleblowing – the passing on of information concerning organisational wrongdoing.
Worker – someone with a contract to do work for personal benefit.

2. Policy Introduction

The RNLI is committed to conducting its business with honesty and integrity, and to high standards. However, every organisation faces the risk that something will go wrong from time to time, or unknowingly harbouring malpractice or unethical conduct. The Institution welcomes the opportunity to address these situations as early as possible, and this policy describes its approach to managing concerns raised by individuals. The RNLI is committed to creating an open, transparent and safe working environment where individuals feel able to speak up, and wishes to create an understanding in all workers and volunteers that they demonstrate support and encouragement of whistleblowing.

The arrangements described in this policy fulfils the RNLI's legal obligations relating to the Public Interest Disclosure Act (1998), and satisfies the requirements outlined in the UK Fundraising Regulator's Code of Fundraising Practice (2017).

This policy describes:

- the type of issues that can be raised and the process for doing so
- how the person raising a concern will not suffer detriment for having done so
- how and what the organisation will do in response to receiving such information
- how an individual can escalate their concern to an external body, such as the Charity Commission.

3. Policy

A worker or volunteer who passes information concerning wrongdoing must reasonably believe that:

- they are acting in the public interest - personal grievances and complaints should be raised under the RNLI's Grievance Procedure or Volunteer Problem Solving Policy
- the disclosure tends to show past, present or likely future wrongdoing in one of the following:
 - criminal offences
 - failure to comply with legal obligations
 - miscarriages of justice
 - dangers to health and safety
 - dangers to the environment
 - deliberate concealment of any of the above categories.

The expectation is that individuals do not make a declaration for the purposes of personal gain and only raise concerns where it is reasonable to do so in the circumstances. The law provides protection for workers who raise legitimate concerns about specified matters ("qualifying disclosures"), and whilst not afforded statutory protection, volunteers who raise concerns internally will be supported by the RNLI.

The worker or volunteer will not suffer a detriment* for having raised a concern made in good faith - if they believe that have suffered detriment for having raised a concern, they should report this. The RNLI will sanction those who are found to have subjected an individual to detriment according to its disciplinary / problem solving procedures.

** A detriment is a disadvantage such as: failure to promote; denial of training; blocking access to resources; disciplinary sanction; bullying or harassment; victimisation; demotion; dismissal; failure to investigate a subsequent concern.*

The organisation encourages individuals to raise their serious concerns under the Raising Organisational Concerns (Whistleblowing) Procedure. Concerns raised that name the RNLI's Chief Executive, Executive Team member, or Trustee in the complaint will be reviewed by unconflicted members of the executive (namely, either the Chairman (or Deputy Chair) and People Director, or Chief Executive depending on the circumstances). This will enable the development of an investigation and reporting strategy that upholds the integrity of the process.

Any matter raised under this policy will be investigated thoroughly, promptly and fairly. Where possible and appropriate, the individual raising the concern will be informed of the progress of the investigation and its likely timescale. Recommendations for change may be made to minimise the risk of future wrongdoing.

Individuals should not suffer any detrimental treatment as a result of legitimately raising a concern, including dismissal / ceasing of the volunteer arrangement, disciplinary / formal action, threats or other unfavourable treatment. If the whistleblower believes they have suffered any such treatment, they should inform the RNLI's Whistleblowing Officer. If it is found that an individual has maliciously made false allegations or with a view to personal gain, they will be subject to action under the RNLI's Disciplinary Procedure or Volunteer Problem Solving Policy.

If an individual is concerned or has complaints relating to their own personal circumstances and the way they have been treated, they should use the organisation's Grievance Procedure or the Volunteer Problem Solving Procedure.

If the whistleblower is not satisfied with the RNLI's response to the concern raised, they may wish to escalate it to an external body. Contact details of organisations that can provide advice and guidance on this are contained in the Raising Organisational Concerns (Whistleblowing) Procedure.

The RNLI Whistleblowing Officer will maintain a register of concerns raised, recording the nature of the disclosures, and the outcomes of the triage and investigations process. The Audit and Risk Committee will provide independent oversight and review of the RNLI's whistleblowing arrangements.

Related Procedures & Guidance
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Raising Organisational Concerns (Whistleblowing) Procedure
