

## Whistleblowing Policy

### Introduction

Spinal Injuries Association (SIA) is committed to maintaining high standards of openness, honesty, integrity, probity and accountability.

In line with this commitment, it encourages individuals with serious concerns about any fraud, misconduct or wrongdoing by staff or others working on behalf of the charity to come forward and voice those concerns. This includes bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. Any suspected wrongdoing should be reported as soon as possible.

This policy makes it clear that such concerns can be raised without fear of reprisal and reflects the requirements of the Public Interest Disclosure Act 1998. This policy applies to all employees, trustees, volunteers, contractors, and any individuals working on behalf of the charity. It does not form part of any contract of employment and we may amend it at any time.

This policy reflects the requirements of the **Public Interest Disclosure Act 1998 (PIDA)**, which protects workers who disclose concerns in the public interest. It also takes account of the **Charity Commission's guidance on whistleblowing**, the **Code of Fundraising Practice**, and evolving best practice in the charity and employment sectors.

SIA is committed to ensuring that whistleblowers are supported and that concerns are handled fairly, confidentially, and in line with current legal and regulatory expectations. This policy sets out how individuals may raise any concerns that they have and how those concerns will be dealt with.

### Background

Whistleblowing legislation provides protection for workers who raise genuine concerns about specified matters in the public interest. A qualifying disclosure is one made by an employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- or concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. You have no responsibility for investigating the matter – it is the charity's responsibility to ensure that an investigation takes place.

We encourage you to raise your concerns under this procedure in the first instance.

## Process

This process is for raising concerns in the public interest, such as wrongdoing or risks affecting others. It is not intended for concerns about breaches of your own employment contract, such as pay or working conditions. These should be raised through the grievance procedure.

**Stage 1:** In the first instance, any concerns should be raised with the relevant departmental head, who will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above.

Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained. The departmental head will take any necessary action, including reporting the matter to the directors and/or the chair of trustees and any appropriate government department or regulatory agency. A disciplinary action may also be invoked, if required. On conclusion of any investigation, you will be told the outcome and what the charity has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

If an individual feels it is inappropriate to raise their concerns with the departmental head in the first instance (for example, if their concerns are about their departmental head's actions or if they are so serious that they should be escalated to someone at a more senior level within SIA), then he/she should speak to the relevant director in the first instance instead. All such approaches will be treated in the strictest confidence. They will not result in a report to anyone within SIA without the individual's agreement except where it is believed that the issues raised are so serious that further action may be required. Where this is the case, they will refer it to the chief executive of SIA.

**Stage 2:** You should escalate the matter to the chair of trustees if you are concerned that directors/CEO:

- are involved in the wrongdoing
- have failed to make a proper investigation
- or have failed to report the outcome of the investigations to the relevant person.

The chair will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the board.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

## Dealing with disclosures

If an individual reports a disclosure to SIA, the need for confidentiality will be respected wherever possible, although any concern raised under this procedure will need to be properly documented and reported as necessary to the appropriate director and board committee.

SIA hopes that all individuals should feel able to voice whistleblowing concerns, as completely anonymous disclosures are more difficult to investigate.

The action taken in response to a disclosure will depend on the nature of the concern. By way of example, the matters raised may result in one or more of the following:

- No action required;
- Action being taken under other SIA policies and/or procedures;
- An internal investigation under this policy;
- A referral to the police;
- A referral to SIA's external auditors;
- A referral to the Charity Commission;
- An independent enquiry.

The responsible person to whom the disclosure is made will:

- Make a detailed record of the disclosure;
- Ask the individual to provide a written statement describing the precise nature of the allegations (incl. the background history of the concern, any relevant dates and any evidence or grounds for suspicion behind the concern) ;
- Upon receipt of the written statement, decide whether any further action may be required. Where it is, they will refer it to the appropriate person and write to the individual within five working days of making that decision. In their letter, they will acknowledge receipt of the complaint, provide information on who it has been referred to and details of who the individual should contact if they have any further questions.

The charity will aim to complete whistleblowing investigations within 4 to 6 weeks of the concern being raised. If the investigation is likely to take longer, the individual will be informed of the revised timescale and the reasons for the delay. Throughout the process, the whistleblower will be kept informed of progress at regular intervals, as practical, and will be notified of the outcome wherever appropriate.

## Protection and support for whistleblowers

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Head of people and operations immediately.

You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

## Contacts

### Protect

(Independent whistleblowing charity) Helpline: 020 3117 2520

Website: <https://protect-advice.org.uk>

<b>Policy Owner (responsibility)</b>	Director of finance and operations
<b>Review schedule</b>	Annual
<b>Date of last review</b>	December 2025
<b>Date of next review</b>	December 2026 (or sooner if significant changes to relevant legislation occur)
<b>Approval level</b>	SLT Finance, people and operations committee
<b>Related policies</b>	Disciplinary and dismissal policy Grievance policy Harassment and bullying policy Anti-fraud policy Data protection policy

## Whistleblowing Reporting & Actions Flowchart

This flowchart outlines the steps individuals should follow when raising a whistleblowing concern, in line with the Spinal Injuries Association's Whistleblowing Policy.

