GLIAS

Greater London Industrial Archaeology Society

Corporate Policy Number 36	Date Last Updated: January 2025 Date for Next Review: January 2027 Director Responsible: TM Sidaway
Whistleblowing	

1. Policy

It is important that any fraud, misconduct or wrongdoing by Directors or anyone else working on behalf of GLIAS is reported and properly dealt with. We therefore require all individuals to raise any concerns that they may have about the conduct of others in the charity or the way in which the organisation is run. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

2. Background

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters in the public interest. These are called 'qualifying disclosures'. A qualifying disclosure is one made by an individual who has a reasonable belief that any of the following is being, has been or is likely to be, committed:

- 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
- Concealment of any of the above

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. If you make a protected disclosure you have the right not to be dismissed, subjected to any other detriment or victimised because you have made a disclosure. We encourage you to raise your concerns under this procedure in the first instance.

3. **Principles**

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Directors and others working on behalf of the charity should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.

- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.

- No Director or other person working on behalf of the charity will be victimised for raising a matter under this procedure. This means that the continued involvement of the individual will not be prejudiced because they have raised a legitimate concern.

- Victimisation of an individual for raising a qualified disclosure will not be countenanced.

- If misconduct is discovered as a result of any investigation under this procedure, appropriate measures will be taken by the Board. Maliciously making a false allegation will not be countenanced.

- An instruction to cover up wrongdoing is itself an offence. If told not to raise or pursue any concern, you should not agree to remain silent. You should report the matter to the chair of the board or another Director.

4. Procedure

This procedure is for disclosures about all matters.

Stage 1

In the first instance, any concerns should be raised with the Chair of the Board or another Director, 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 relevant Director will take any necessary action, including reporting the matter to the Board and any appropriate government department or regulatory agency. The Board will also invoke any disciplinary action 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.

Stage 2

If on conclusion of stage 1 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. This includes:

- HM Revenue & Customs
- the Health and Safety Executive
- the Environment Agency
- the Serious Fraud Office
- the Charity Commission
- the Pensions Regulator

- the Information Commissioner
- the Financial Conduct Authority