

Northern Ireland Blood Transfusion Service

POLICY DOCUMENT

Document Details

Document Number: POL:11:PP:038:04:NIBT **No. of Appendices:** 3
Supersedes Number: POL:11:PP:038:03:NIBT
Document Title: RAISING A CONCERN IN THE PUBLIC INTEREST
(WHISTLEBLOWING) POLICY AND PROCEDURE
ISSUE DATE: 2nd OCTOBER 2024 **EFFECTIVE DATE:** 16th OCTOBER 2024

Document Authorisation

Written By: D Gillespie, Corp Governance, Risk & EP Manager **Date:** 19.09.2024
Authorised By: K Jackson, Chief Executive **Date:** 16.09.2024

CROSS REFERENCES

This Policy refers to the following documents:

Doc Type	Doc. No.	Title
POL	PP:014	Disciplinary Policy and Procedure
POL	PP:026	Grievance Policy / Procedure
POL	PP:034	Policy and Procedure for the Maintenance of Professional Registration
POL	PP:007	Conflict, Bullying and Harassment in the Workplace Policy
SOP	BD:017	Procedure for Processing Complaints and Other Contacts
POL	QP:003	NIBTS Incident Management Policy
POL	FP:002	Fraud Policy
POL	FP:004	Fraud Response Plan
APP	A	NIBTS Roles and Responsibilities
APP	B	NIBTS Procedure for Responding to Concerns
APP	C	Raising a Concern in the Public Interest & Whistleblowing Process Flowchart

Key Change From Previous Revision:

Policy fully revised and reformatted based on the updated [HSC Framework and Model Policy for Raising a Concern in the Public Interest \(Whistleblowing\)](#) - Refer to <https://www.health-ni.gov.uk/publications/raising-concern-public-interest-whistleblowing-hsc-framework-and-model-policy>
Policy and procedure combined into one document.

Contents

1. Introduction	3
2. Aims and Objectives	4
3. Scope	5
4. Suspected Fraud.....	7
5. Northern Ireland Blood Transfusion Service commitment to you	8
5.1. Your safety and protection.....	8
5.2. Confidentiality	8
5.3. Anonymity	9
6. Raising a concern	9
6.1. Who should I raise a concern with?.....	9
6.2. Independent advice	10
6.3. How should I raise my concern?	11
6.4. Supporting you.....	11
7. Raising a concern externally	12
8. The Media	12
9. Conclusion	13
10. Equality, Human Rights & DDA	13
12. Alternative Formats	13
13. Sources of advice in relation to this document	13
Appendix A – NIBTS Roles and Responsibilities	14
Appendix B - NIBTS Procedure for Responding to Concerns	17
Appendix C - Raising a Concern in the Public Interest (Whistleblowing) Process Flowchart ...	22

1. Introduction

All of us at one time or another may have concerns about what is happening at work. The Northern Ireland Blood Transfusion Service (NIBTS) wants you to feel able to raise your concerns with your managers at any time. We expect our managers to listen to those concerns, take them seriously and take action to resolve the concern, either through providing information which gives assurance or taking action to resolve the concern. However, when a concern raised appears to be potentially serious because it is about a possible danger, professional misconduct or financial malpractice, illegality or wrongdoing that might affect patients, donors, colleagues, or NIBTS itself, it can be difficult to know what to do.

NIBTS recognises that many issues are raised by staff and addressed immediately by line managers – this is very much encouraged. This policy and procedure are aimed at those issues and concerns raised which **remain unresolved, require help to get resolved or are about serious underlying concerns.**

Whistleblowing refers to workers (employees / contractors / agency staff) reporting suspected wrongdoing at work, for example, concerns about patient safety, health and safety at work, environmental damage or a criminal offence, such as fraud.

You may be worried about raising such issues and may think it best to keep it to yourself, perhaps feeling it is none of your business or that it is only a suspicion. You may also feel that raising the matter would be disloyal to colleagues, to managers or to the organisation. It may also be the case that you have said something but found that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

Remember that if you are a healthcare professional you may have a professional duty to report a concern. **If in doubt, please raise it.**

Rather than wait for proof, raise the matter when it is still a concern. If something is troubling you which you think we should know about or look into, please let us know. NIBTS has implemented these whistleblowing arrangements for you to raise any concern that you may have, where the interests of others or the organisation itself are affected or are at risk.

2. Aims and Objectives

NIBTS is committed to running the organisation in the best way possible. The aim of this policy is to promote a culture of openness, transparency and learning in line with the HSC shared values which at the same time:

- reassures you that it is safe and acceptable to speak up;
- upholds patient/donor confidentiality;
- contributes towards improving services provided by NIBTS;
- assists in the prevention of fraud and mismanagement;
- demonstrates to all staff and the public that NIBTS is ensuring its affairs are carried out ethically, honestly and to high standards;
- provides an effective and confidential process by which you can raise concerns so that patients, donors, clients and the public can be safeguarded.

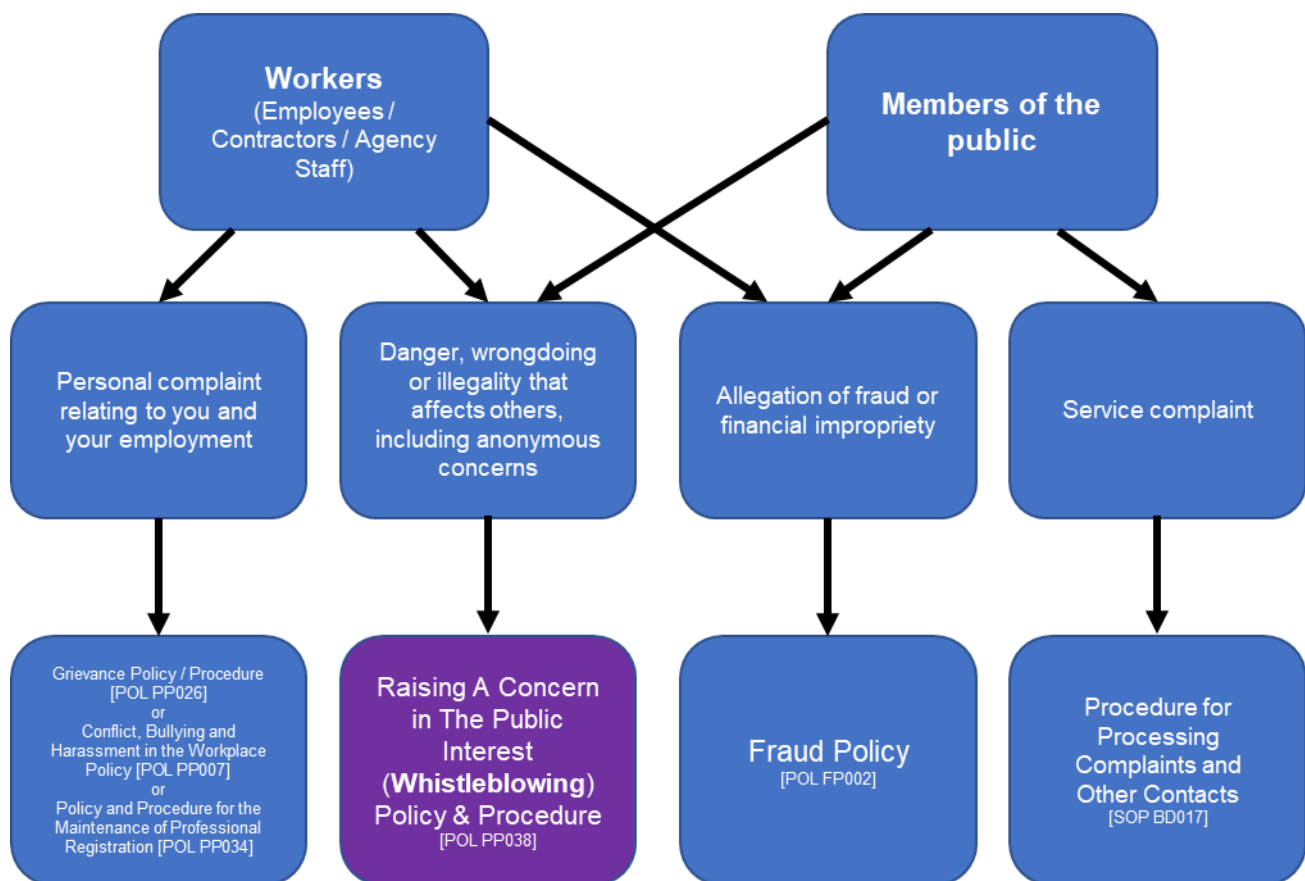
The NIBTS roles and responsibilities in the implementation of this policy are set out at

[Appendix A](#).

3. Scope

The Northern Ireland Blood Transfusion Service (NIBTS) recognises that existing policies and procedures (*Disciplinary Policy and Procedure [POL:PP:014]*, *Grievance Policy / Procedure [POL:PP:026]*, *Policy and Procedure for the Maintenance of Professional Registration [POL:PP:034]*, *Conflict, Bullying and Harassment in the Workplace Policy [POL:PP:007]*, *Procedure for Processing Complaints and Other Contacts [SOP:BD:017]* and *the NIBTS Incident Management Policy [POL:QP:003]*) may not always be appropriate for concerns to extremely sensitive issues which may need to be handled in a different way.

The table below, adapted from the Northern Ireland Audit Office (NIAO) good practice guide for Raising Concerns¹, explains how various different types complaints may be best taken forward:



¹ <https://www.niauditoffice.gov.uk/publications/raising-concerns-good-practice-guide-northern-ireland-public-sector>

This policy does not apply in every instance to patients/donor or members of the public who wish to complaint about NIBTS. Concerns relating to matters of care which are personal to an individual or a relative may be more appropriately dealt with under the *Procedure for Processing Complaints and Other Contacts [SOP:BD:017]*.

This policy provides a procedure for raising concerns where the interests of others or of the organisation itself are at risk.

If a member of staff is aggrieved about their personal position, they must follow the organisations *Grievance Policy / Procedure [POL:PP:026]* or the *Conflict, Bullying and Harassment in the Workplace Policy [POL:PP:007]*, depending on the nature of the complaint. Advice and guidance on the most appropriate policy can be sought from the HR Department.

All cases of suspected, attempted or actual fraud raised under this policy will be handled promptly in line with the organisations *Fraud Policy [POL:FP002]*.

This policy applies to the following groups:

- staff of NIBTS including permanent, temporary and bank staff;
- staff in training/placements working within NIBTS;
- independent contractors engaged to provide services;
- volunteers;
- agency staff;
- Members of the public.

The type of complaints dealt with under this policy may include:

- malpractice or ill treatment of a patient, donor or client by a member of staff;
- where a potential criminal offence has been committed, is being committed or is likely to be committed;
- suspected theft or fraud;
- breach of Standing Financial Instructions;
- disregard for legislation, particularly in relation to Health and Safety at Work;
- the environment has been, or is likely to be, damaged;
- failing to declare a conflict of interest;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- showing undue favour over a contractual matter or to a job applicant;
- research misconduct; or
- information on any of the above has been, is being, or is likely to be concealed.

The list above is not intended to be exhaustive or restrictive.

If you feel that something is of concern, and that it is something which you think NIBTS management should know about or look into, you should use this procedure.

This policy complements professional and ethical rules, guidelines and codes of conduct. It is not intended to replace professional codes and mechanisms which allow questions about professional competence to be raised. (However, such issues can be raised under this process if no other more appropriate avenue is apparent).

4. Suspected Fraud

If your concern is about possible fraud or bribery NIBTS has a number of avenues available to report your concern. These are included in more detail in the NIBTS *Fraud Policy [POL:FP:002]* and *NIBTS Fraud Response Plan [POL:FP:004]* and are summarised below.

Suspensions of fraud or bribery should initially be raised with the appropriate line manager but where you do not feel this is appropriate the following officers may be contacted:

- Head of Finance and IM&T
- Another member of the Senior Management Team (SMT)
- Fraud Liaison Officer (FLO) – Refer to the *NIBTS Fraud Response Plan [POL:FP:004]*

Employees can also contact the regional HSC fraud reporting hotline on:

0800 096 33 96 or report their suspicions online. These avenues are managed by BSO Counter fraud and Probity Services (CFPS) on behalf of the HSC and reports can be made on a confidential basis.

The NIBTS *Fraud Response Plan [POL:FP004]* will be instigated immediately on receipt of any reports of a suspicion of fraud or bribery.

The prevention, detection and reporting of fraud and bribery and other forms of corruption are the responsibility of all those working for NIBTS or those or under its control. NIBTS expects all staff and third parties to perform their duties impartially, honestly, and with the highest integrity.

5. Northern Ireland Blood Transfusion Service commitment to you

5.1. Your safety and protection

The Northern Ireland Blood Transfusion Service (NIBTS), Board, the Chief Executive, managers and the trade unions/professional organisations are committed to this policy. If you raise a concern under this policy, you will not be at risk of losing your job or suffering any detriment (such as a reprisal or victimisation). NIBTS will not tolerate the harassment or victimisation of anyone who raises a genuine concern.

NIBTS expects you to raise concerns about malpractices. If any action is taken that deters anyone from raising a concern or victimises them, this will be viewed as a disciplinary matter.

Provided you raise a concern with a reasonable belief in its truth, it does not matter if it turns out that you are mistaken or if there is an innocent explanation for your concerns, you will be protected under the law. If staff raise a matter they know to be untrue, protection under the law cannot be guaranteed and NIBTS reserves the right to take disciplinary action if appropriate.

5.2. Confidentiality

With these assurances, NIBTS hopes that you will raise concerns openly. However, we recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, you should say so at the outset to a member of staff in the Human Resources Department.

Where possible, NIBTS is committed to maintaining confidentiality for everyone involved in a concern. This includes the person raising the concern and the person(s) whom the concern is about. As far as possible, confidentiality will be maintained throughout the process and after the issue has been resolved.

If you ask for your identity not to be disclosed, we will make every effort not to do so without your consent unless required by law. You should however understand that there may be times when we will be unable to resolve a concern without revealing your identity, for example, where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

5.3. Anonymity

Remember that if you do not disclose your identity, it will be much more difficult for us to look into the matter. It will also not be possible to protect your position or give you feedback. Further, without additional evidence, it may be difficult to investigate such complaints properly in order to establish the facts. So, while we will consider anonymous reports in a similar manner as those which are not anonymised, these arrangements are not best suited to deal with concerns raised anonymously.

6. Raising a concern

If you are unsure about raising a concern, you can get independent advice at any stage from your trade union/professional organisation, or from one of the listed organisations accessed via the link in [Section 7](#). You should also remember that you do not need to have firm evidence before raising a concern, only a reasonable belief that an act of wrongdoing has occurred or that there has been a deliberate attempt to cover up a wrongdoing. However, you should explain as fully as possible the information or circumstances that gave rise to the concern.

If you remain unsure about raising a concern, you can get independent advice from Protect (see contact details in [Section 6.2](#)).

6.1. Who should I raise a concern with?

Option 1:

In many circumstances the easiest way to get your concern resolved will be to raise it with your line manager. Where you do not think it is appropriate or it has failed to resolve the matters satisfactorily, you can use any of the options set out below.

Option 2:

If raising it with your line manager does not resolve matters, or you do not feel able to raise it with them, please raise the matter with another senior person you can trust. You may wish to involve a trade union representative or work colleague for support.

Option 3:

If you still remain concerned after this, you can contact:

- Head of HR & Corporate Services - *who has responsibility for raising concerns in the public interest*
- Chief Executive Officer
- Medical Director
- Head of Finance & IT
- Head of Testing Services
- Head of Blood and Component Supply Chain Services
- Quality and Regulatory Compliance Manager
- Non-Executive Member (NEM) of the NIBTS Board, Lead for Raising Concerns – *contactable through the office of the Chief Executive, Trust Headquarters*

All these people are required to receive training in dealing with concerns and will give you information about where you can go for support.

Option 4:

If for any reason you do not feel comfortable raising your concern internally, you can raise concerns with external bodies (see [Section 7](#) below).

If exceptionally, the concern is about the Chief Executive, then it should be made (in the first instance) to the Chair of the NIBTS Board, who will decide on how the concern raised should progress.

6.2. Independent advice

If you are unsure whether to use this policy, or if you require confidential advice at any stage, you may contact your trade union/professional organisation.

Advice is also available through the independent charity **Protect**, on telephone 020 3117 2520. Visit <https://protect-advice.org.uk/> for further information.

6.3. How should I raise my concern?

You can raise your concerns with any of the people listed above, in person, by phone or in writing (including email).

Whichever route you choose, please be ready to explain as fully as you can the information and circumstances that gave rise to your concerns.

If in writing or email, you should set out the background and history of the concerns giving where possible:

- Names,
- Dates,
- Places, and
- The reasons why you are particularly concerned about the situation.

If you do not feel able to put the concern in writing, you can of course raise your concern via telephone or in person. A statement can be taken of your concern which can be recorded for you to verify and sign.

6.4. Supporting you

It is recognised that raising concerns can be difficult and stressful. Advice and support is available from the Corporate Governance, Risk, and Emergency Planning Manager throughout any investigation process. The Corporate Governance, Risk, and Emergency Planning Manager will not undertake an investigation or decision-making role in the whistleblowing case but will provide support throughout the process, ensuring that feedback is provided at appropriate stages of the investigation.

NIBTS also provides independent support services to all employees through its Employee Assistance Programme - **Inspire**; this service is free to all employees and is available 24/7. Telephone number: 0808 800 0002. NIBTS will take steps to minimise any difficulties which you may experience as a result of raising a concern. For example, if you are required to give evidence, the Corporate Governance, Risk, and Emergency Planning Manager will arrange for you to receive advice and support throughout the process. If you are dissatisfied with the resolution of the concern you have raised or you consider you have suffered a detriment for having raised a concern, this should be raised initially with the Corporate Governance, Risk, and Emergency Planning Manager.

7. Raising a concern externally

NIBTS hopes this policy reassures you of its commitment to have concerns raised under it taken seriously and where appropriate and/or necessary fully investigated, and to protect an individual who raises such concerns.

Whilst there may be occasions where individuals will wish to report their concerns to external agencies or the PSNI, NIBTS would hope that the robust implementation of this policy will reassure staff that they can raise such concerns internally in the first instance.

However, NIBTS recognises that there may be circumstances where you can raise a concern with an outside body as specified in the following schedule to The Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014 at <https://www.legislation.gov.uk/nisr/2014/48/schedule/made> for a full list of contacts.

Disclosure to these organisations/persons will be protected provided you honestly and reasonably believe the information and associated allegations are substantially true.

We would wish you to raise a matter with the external agencies listed above than not at all.

Protect (Telephone: 020 3117 2520, Web address: <https://protect-advice.org.uk/>)

or your Trade Union representative will be able to advise you on such an option and on the circumstances in which you may be able to contact an outside body safely.

8. The Media

You may consider going to the media in respect of your concerns if you feel the NIBTS has not properly addressed them. You should carefully consider any information you choose to put into the public domain to ensure that patient/client/donor confidentiality is maintained at all times. NIBTS reserves the right to take disciplinary action if patient/client/donor confidentiality is breached.

Communications with the media are coordinated by the Chief Executive's Office on behalf of NIBTS. Staff approached by the media should direct the media to the Chief Executive's Office in the first instance.

9. Conclusion

While we cannot always guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly, impartially and thoroughly. By using these whistleblowing arrangements, you will help us to achieve this.

Please note, this document has been developed to meet best practice and comply with the Public Interest Disclosure (NI) Order 1998 (as amended) (the Order) which provides employment protection for whistleblowing.

The Order gives significant statutory protection to staff who disclose information reasonably in the public interest. To be protected under the law an employee must act with an honest and reasonable belief that the matters specified in the concern raised occurred, is occurring or is likely to occur. Disclosures may be made to certain prescribed persons or bodies external to the NIBTS listed in the Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014.

10. Equality, Human Rights & DDA

NIBTS confirms this policy has been drawn up and reviewed in the light of Section 75 of the Northern Ireland Act (1998) which requires the NIBTS to have due regard to the need to promote equality of opportunity. It has been screened to identify any adverse impact on the 9 equality categories.

The policy has been **screened out** without mitigation or an alternative policy proposed to be adopted.

12. Alternative Formats

This document can be made available on request on disc, larger font, Braille, audio-cassette and in other minority languages to meet the needs of those who are not fluent in English.

13. Sources of advice in relation to this document

The Head of HR & Corporate Services may be contacted with regard to any queries on the content of this policy.

Appendix A – NIBTS Roles and Responsibilities

Lead Non-Executive Director

- To have responsibility for oversight of the culture of raising concerns within their organisation in accordance with the HSC Board Member Handbook (Section 4.12) – Visit: <https://www.health-ni.gov.uk/publications/hsc-board-member-handbook>
- To provide assurance to Board that there are robust arrangements in place in relation to raising and handling concerns

The Board and Senior Management Team of the Northern Ireland Blood Transfusion Service

- To listen to our staff, learn lessons and strive to improve patient/donor care
- To ensure that this policy enables genuine concerns that are raised to be dealt with effectively
- To promote a culture of openness and honesty and ensure that issues are dealt with responsibly and taken seriously
- To ensure that employees who raise concerns do not suffer any detriment for doing so unless other circumstances come to light which require this, e.g., where a member of staff knowingly raises an issue regarding another member of staff which they know to be untrue
- To share learning, as appropriate, via our shared learning procedures

Head of HR & Corporate Services

- To take responsibility for ensuring the implementation of the whistleblowing arrangements
- To ensure that any safety issue about which a concern has been raised is dealt with properly and promptly and escalated appropriately through appropriate management levels / professional lines
- To ensure that all awareness and training requirements arising from this policy are delivered
- To undertake regular staff surveys to enable the organisation to monitor staff response in relation to feeling able to speak up if they have a concern
- To provide updates and assurance to the NIBTS Board, via the Governance and Risk Management Committee, on the management of whistleblowing and the status of active concerns

Corporate Governance, Risk, and Emergency Planning Manager

- To provide advice and support to staff and managers on the Policy and Procedures related to Raising a Concern in the Public Interest (Whistleblowing).
- To develop and deliver training for managers on these Policy and Procedures
- To organise speaking up awareness campaigns to ensure staff are encouraged to speak up if they have any concerns
- To oversee any investigations undertaken and provide support to the individual raising the concern throughout the process, ensuring that feedback is provided at appropriate stages of the investigation
- To maintain a central log of all concerns raised
- To intervene if there are any indications that the person who raised the concern is suffering any recriminations
- To work with Head of Departments and Managers to address the culture and tackle the obstacles to raising concerns.

All Managers

- To ensure staff are familiar with and have access to this Policy and Procedure
- To ensure new staff are made aware of the Policy and Procedure during their induction
- To take any concerns raised with them seriously and consider them fully and fairly and respond quickly and appropriately taking any necessary and appropriate action
- To recognise that raising a concern can be a difficult experience for some staff and to treat the matter in a sensitive manner if required
- To seek immediate advice from HR on the handling of any concern raised, and other professionals within NIBTS where appropriate
- To ensure that staff are supported following the raising of concerns so as not to suffer detriment
- To create an open and safe atmosphere (in team meetings, appraisals etc) where staff feel their views, regarding the effective and safe delivery of care and services to our service users, will be welcomed and be seen as an opportunity to learn and to consider how services can be improved
- To ensure feedback/ learning at individual, team and organisational level on concerns raised in the public interest and how they were resolved

All Members of Staff

- To recognise that it is your duty to draw any matter of concern to the attention of NIBTS
- To adhere to the procedures set out in this policy
- To maintain the duty of confidentiality to patients, donors and NIBTS and consequently, where any disclosure of confidential information is to be justified, you should first, where appropriate, seek specialist advice for example from a representative of a regulating organisation such as the Nursing & Midwifery Council or the General Medical / Dental Council

Role of Trade Unions and other Organisations

All staff have the right to consult and seek guidance and support from their Professional Organisations, Trade Union or from statutory bodies such as the Nursing & Midwifery Council, the General Medical Council, Health Professional Council and the Northern Ireland Social Care Council.

Appendix B - NIBTS Procedure for Responding to Concerns

How We Will Deal with the Concerns

Stage 1 - Informal

Employee

If you have an honest and reasonable belief that a concern about malpractice, risk, abuse or wrongdoing has occurred, is occurring, or is likely to occur, then the matter should be raised informally in the first instance with your Line Manager. This may be done verbally or in writing.

You are entitled to support from a trade union/ fellow worker or companion to assist you in raising your concern.

If you feel unable to raise the matter with your Line Manager, for whatever reason, please raise the matter with their line manager or another more senior manager within NIBTS.

Whilst it would be the preference of NIBTS for you to raise the matter openly, if you want the matter dealt with in confidence, please say so at the outset so that appropriate arrangements can be made.

Manager

Any manager to whom a concern is raised must arrange to meet with the employee to discuss the detail of the concern **without delay**.

The manager should be clear on the range of other policies and procedures in the event that the concern raised might be more appropriately dealt with under another policy / procedure e.g. grievance procedure, conflict, bullying and harassment procedure, maintaining high professional standards (Medical & Dental staff).

The manager should establish the background and history of the concerns, including names, dates, places, where possible, along with any other relevant information. The manager should also explore the reason why the employee is particularly concerned about the matter. The manager should document a summary of the discussion.

The manager should explain that they will need to seek advice from their line manager, providing there are no specific objections raised by the employee regarding protection of their confidentiality in this regard. If there are concerns expressed as to who should be made aware, then the manager should seek advice immediately from the Corporate Governance, Risk, and Emergency Planning Manager.

Managers must ensure **all** whistleblowing concerns are shared with the Corporate Governance, Risk, and Emergency Planning Manager to ensure it is logged centrally and a record kept in relation to the decision making.

If the concern is raised with the Head of HR & Corporate Services they will refer the concern to Corporate Governance, Risk, and Emergency Planning Manager to arrange to meet with the employee to discuss the detail of the concern.

It may be necessary with anonymous allegations to consider whether it is possible, based on limited information provided in the complaint, to take any further action. Where it is decided that further action cannot be justified, the reasons for this decision should be documented and retained by the Corporate Governance, Risk, and Emergency Planning Manager.

It should be noted that if the concern is already, or has previously been, the subject of an investigation under another procedure it will not be appropriate to reinvestigate under this policy.

Stage 2 – Formal – Screening stage

If these channels have been followed and you still have concerns or your concerns remain unresolved, or if you feel that the matter is so serious that you cannot discuss it with any of the above members of staff through the informal process, please contact the Corporate Governance, Risk, and Emergency Planning Manager.

Within a prompt and reasonable timescale of the concern being received, the Corporate Governance, Risk, and Emergency Planning Manager will meet with the employee to:

- Acknowledge that the concern has been received;
- Discuss if confidentiality is to be / can be maintained throughout investigation, and ensure this is documented on the central record;
- Discuss options in relation to how the matter may be dealt with and by whom;
- Outline the support available;
- Provide an estimate as to how long it will take to provide a response.

A summary of the discussions will be followed up in writing.

NIBTS will endeavour to resolve concerns informally where possible in the interests of all involved. However, it is recognised this will not always be possible. In circumstances where the Corporate Governance, Risk, and Emergency Planning Manager does not feel it is possible or appropriate for the matter to be resolved informally then a screen process will be undertaken to determine the most appropriate route/s and process/es for all or parts of your concern.

This screening exercise will be undertaken by an Oversight Group, chaired by the Head of HR & Corporate Services and the relevant Heads of Service, depending on the nature of the concerns. During the meeting the Head of HR & Corporate Services will advise the Oversight Group members that a concern has been raised and the nature of it. The Head of HR & Corporate Services will withhold the identity of the individual raising the concerns, if requested.

A record will be made of the decisions and/or actions agreed during the Oversight Group meeting. If a decision is made to proceed to formal investigation, the terms of reference of the investigation should also be discussed, agreed and recorded during the Oversight Group meeting.

The Head of HR & Corporate Services will ensure that Corporate Governance, Risk, and Emergency Planning Manager is aware of the concern (if not previously aware) to ensure any necessary support can be provided to the employee raising the concern.

Stage 3 – Formal – Investigation stage

A proportionate investigation – using someone suitably independent (usually from a different part of the organisation), will be undertaken and conclusion reached within a reasonable timescale. The investigation will be objective and evidence-based, and a report of the findings will be produced.

Stage 4 – Consideration of Report – agreeing next steps

The Oversight Group will consider the report and determine any action required, based on the findings, including any lessons to be learned to prevent problems recurring.

The case file for all whistleblowing investigations will not be concluded until the report is finalised and all recommendations have been addressed.

Communicating with you

We welcome the raising of concerns and will treat you with respect at all times. We will discuss your concerns with you to ensure we understand exactly what you are worried about. In the event that an investigation is required, we will endeavour to provide a response within 12 weeks of the concern being received. We will provide an update on progress by week 6 and again by week 10 of the investigation. In so far as it is appropriate, we will provide feedback to the person who raised the concern.

The Corporate Governance, Risk, and Emergency Planning Manager will be the central point of contact for feedback for you, on the status of formal investigations.

Board oversight

The NIBTS Board and the Department of Health (DoH) will be given high level information about all concerns raised by our staff and others through this policy and what we are doing to address any problems. We will include similar high-level information in our annual report. The organisation's Board supports staff and others raising concerns and want you to feel free to speak up. The Chair has nominated a non-executive member (NEM) of the board with responsibility for the oversight of the organisation's culture of raising concerns in the public interest.

To obtain the name and contact details of the current NIBTS NEM responsible for Raising a Concern contact the Chief Executive's Office.

Review & Reporting

NIBTS Head of HR & Corporate Services will provide quarterly reports to the NIBTS Governance & Risk Management Committee and Agency Board on the Raising Concerns/Whistleblowing caseload and status of active cases.

As commissioned by the DoH Governance Unit, NIBTS Management will provide an annual return, with summary details of Raising Concerns/Whistleblowing cases, to be including in the annual reporting to the DoH Audit Risk and Assurance Committee.

NIBTS will inform the DoH Sponsor Branch immediately of any serious concerns received which are being investigated under this policy. Regular updates will be provided to the Sponsor Branch until the matter is closed.

This policy has been reviewed against the NI Audit Office – Raising Concerns – “A good practice guide for Northern Ireland Public Sector”.

Appendix C - Raising a Concern in the Public Interest (Whistleblowing) Process Flowchart

