

# Whistleblowing policy

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IFS is aware that employees may, under certain circumstances, want to have the opportunity to disclose certain information relating to potentially damaging activities carried on by IFS as an organisation or by employees and trustees. This policy is to clarify the existing law and to outline IFS' preferred procedures for potential disclosures to be made. The policy will be reviewed from time to time by the Trustees.

## 1 Existing Law

For the purposes of the Public Interest Disclosure Act 1998 (PIDA), an employee would be making a "protected disclosure" if, in good faith, he makes a disclosure of:

- a past, present or likely criminal offence,
- a failure to comply with a legal obligation,
- a miscarriage of justice,
- a danger to health and safety,
- damage to the environment.

A disclosure that information tending to show that any of the above have been, or are likely to be deliberately concealed is also protected. The disclosure must be made to the employer, or to a "prescribed person". This is a person or a body which "has been prescribed by the Secretary of State for the purposes of receiving disclosures about the matters concerned" (see

<http://www.berr.gov.uk/whatwedo/employment/employment-legislation/employment-guidance/page16186.html#Appendix1LISTOPRESCRIBEDPERSONS> for more details).

A protected disclosure may only be made elsewhere (e.g. to the media) in very limited circumstances, such as where the employee reasonably believes he will be subjected to a disadvantage if he makes the disclosure to his employer, and it is reasonable to disclose this elsewhere.

There is protection for an employee from dismissal if whistle blowing is found to be fair.

## 2 IFS Disclosures

IFS strives to comply with the law in every aspect of its work and strives to be fair to employees, suppliers and other stakeholders. However if an employee believed that IFS was not complying with the law, was being unfair to a stakeholder, was compromising health and safety or wished to raise any other public interest concerns, the procedures outlined below should be followed. Early notification of a whistle blowing issue could prevent unsubstantiated allegations being publicised and could reassure the employee that IFS was doing all it could to comply with its obligations. It could also avoid misunderstandings between IFS and employees where the facts concerning a potential whistle blowing incident were unclear.

IFS recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisals from those responsible for the malpractice. IFS will not tolerate harassment or victimisation and will take all possible measures to protect employees who raise concerns in good faith.

Employees should be aware that this policy does not exist for employees to make complaints against the management or employees. Neither can it be used for employment disputes. Other procedures exist for these situations.

### 3 Procedures

An employee wishing to make a disclosure concerning IFS should contact the Director in the first instance. They should make it clear that they are raising the concern as a matter of public interest. The employee will be asked to describe their concerns in writing addressed to the Director. If they have difficulty putting these concerns in writing they could ask for assistance and this will be provided by a staff representative. In exceptional circumstances an oral report only may be provided.

The employee and the Director will agree a suitable time scale for a reply which will be in writing. The length of time for receipt of a reply will depend on the complexity of the potential disclosure and the number of people to be consulted. IFS will endeavour to make an initial reply to the employee within 10 working days.

If it is inappropriate, because of the nature of the concern, for the employee to approach the Director, they should approach a senior member of the Administration department. Similarly, if it is inappropriate to approach such an individual, the employee has two options:

1. They may contact their line manager who will have an obligation to report further to the Director or to the Chair of Trustees (<https://ifs.org.uk/about/governance>).
2. They may contact the Chair of Trustees directly. The employee should make it clear to the Chair of Trustees why they cannot contact an employee about their concerns and should also make it clear that they are raising the concern as a matter of public interest. The Chair of Trustees has the option to appoint an employee or an alternative Trustee to investigate the concern on their behalf. The appointed person will report directly to the Chair of Trustees.

If the employee has cause to whistle blow on a stakeholder, particularly a funder, they should first contact the Director and their line manager.

If there is a disclosure concerning the Chair of Trustees, then the Deputy Chair will lead the investigation.

The employee will be kept informed of the progress of the investigation into their concern.

After investigation the employee will receive a written reply which will state whether or not their potential disclosure is upheld.

If after receiving the reply the employee is still not satisfied, they will have the right of appeal either to the Director or to the Chair of Trustees.

If a potential disclosure is upheld then the facts will be made available to all employees and to the Trustees.

### 4 Policy review

#### 4.1 Summary of reviews

Date	Reviewed by	Issues found	Action taken	Notes
18/10/2022	EH	N/A	N/A	Reviewed policy but no changes needed.
1/8/23	EH	Minor edits	Changes as below	

#### 4.2 Log of changes made

Date	Changes made	Changes made by	Major or minor change?	Approved by (major changes only)
1/8/2023	Changed Executive Committee to Board of trustees and added link to governance on website.	EH	MIInor	N/A