

Whistleblowing Policy

1. Our commitment

At Medical Detection Dogs (MDD) we always aim to conduct ourselves ethically, and with honesty and integrity. We do, however, recognise that there may be occasions when we – or our people – do not get this right. In these instances, you may feel that you need to raise your genuine and serious concerns through this whistleblowing policy.

We expect the same high standards from all of our people. This policy applies to all persons working for us or on our behalf, including trustees, employees at all levels whether permanent or temporary, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2. Aim of the policy

The aims of this policy are to:

- provide an effective way for you to raise serious concerns
- ensure that you receive feedback on any action undertaken by us as a result of you raising serious concerns
- ensure that you will be protected from reprisals or victimisation for having raised your concern in good faith
- signpost you to further options available to you if you are dissatisfied with our response, or if internal investigation is not appropriate
- allow Medical Detection Dogs to take action against any employee or volunteer who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so.

It should be noted that the whistleblowing procedures should not be used in relation to employee grievances concerning individual terms and conditions of employment or other aspects of the working relationship

3. Who this policy applies to

We expect the same high standards from all of our people. This policy applies to all persons working for us or on our behalf, including trustees, employees at all levels whether permanent or temporary, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners

4. Defining whistleblowing

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of

justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

5. Protecting individuals using this policy

The Public Interest Disclosure Act 1998 (amended the Employment Rights Act 1996) provides protection for individuals who raise legitimate concerns about specified matters, outlined below.

These are called qualifying disclosures. A qualifying disclosure is one made in good faith by an individual who has a reasonable belief that the following has or may have occurred. Examples include:

- Criminal offences.
- Fraud, bribery or financial mismanagement.
- Abuse of vulnerable groups of people
- Practices that put the health and safety of employees or others at risk.
- Failure to comply with legal obligations.
- Breaches of legislation and legal obligations, such as the Data Protection Act.
- Causing damage to the environment
- 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. You do, however, need to hold a reasonable belief of such an action having been, being or likely to be carried out.

If you make such a protected disclosure, you have the right not to be dismissed, subjected to any other detriment, or victimised. This is the case even were it to materialise that you were genuinely mistaken.

Under the law, interns, contractors or volunteers are not afforded the same legal protection that is afforded to employees. At MDD, however, we want to promote and encourage an open and honest environment in which concerns can be freely raised. We will therefore, in so far as is possible, aim to treat all individuals making a disclosure in the spirit of the Public Interest Disclosure Act 1998.

6. Malicious disclosures

If it is found that you have maliciously raised a matter which you know to be untrue or you are involved in any way in the malpractice, wrongdoing or illegal acts or omissions, your behaviour may be addressed through the disciplinary policy.

7. Non-whistleblowing concerns

This policy is only to be used in the exceptional circumstances as outlined in section 5, above. Other MDD policies that will be relevant in other circumstances.

This list includes but is not limited to:

- safeguarding
- bullying and harassment
- disciplinary procedures
- grievance

8. Raising a concern

You should raise your whistleblowing concern as soon as possible. This will make it easier to act and to enable any problems to be resolved or reported quickly.

You can make your disclosure orally, but written disclosures are preferable as these will make the process more efficient and effective. In your disclosure, you should:

- provide any relevant context and background, including relevant dates, venues, names etc

And

- state clearly the reason why the situation gives cause for concern.

You must say that you are raising your concern using the whistleblowing policy and whether you wish your identity to be kept confidential. While we will make every effort to deal with your case confidentially, depending on the circumstances of the case this may not always be possible. Where this is the case, you will be informed of this and the reasons why it was not possible. We will consider anonymous disclosures, but we do not encourage them as anonymity often makes it difficult to properly investigate concerns, protect employees or give feedback on outcomes.

9. Who should I raise it with?

You should always look to raise the matter with your line manager in the first instance. Where this is not appropriate because they may be involved in the alleged malpractice, wrongdoing or illegal acts or omissions in some way, raise your concern with their manager. The Manager involved will ensure that the CEO is informed and involved as appropriate (unless the CEO themselves is implicated, in which case the Chair of the Board of Trustees). The staff member who raised the concern or issue will be informed of the outcome of the investigations and what, if any, action has been taken.

In some circumstances where it would be inappropriate for you to approach your manager or their manager you should raise the matter directly with HR.

Alternatively, you may raise your concerns directly with the Chief Executive or the Chair of the Charity. The Chief Executive's contact details are Claire.guest@medicaldetectiondogs.org.uk (tel) and the Chair's contact details are clive.everest@btinternet.com (07713 265454)

The Charity has appointed a specific Safeguarding Trustee, responsible for overseeing our safeguarding responsibilities. Safeguarding matters can also be raised directly with this trustee – alanmakepeace@btinternet.com (07850 440395)

Where a concern is about the Chief Executive Officer or a trustee, you should contact the Chief Operating Officer:

Mark.rawden@medicaldetectiondogs.org.uk (07483 213379)

If appropriate, the senior officer may arrange for the concern to be investigated externally and independent of MDD, and for appropriate follow-up action to be taken.

10. What happens after I raise a concern?

Your disclosure will always be acknowledged within three working days. It will be investigated by the MDD manager or senior officer that you raise your concern to. If you raised your concern with a trustee, that trustee will decide who best should investigate the matter.

They will arrange to meet you as soon as possible, away from the workplace if necessary, to enable you to explain your concern, as outlined in section 8, above.

As per section 8 above, we may not always be able to keep your details confidential, but we will always let you know if it is not possible to do so.

You will be told either at the meeting or as soon as possible afterwards, what action will be taken to address the concern you have raised. Where action is not taken, you will be informed and given an explanation. The action taken in response to a disclosure will depend on the nature of the concern.

Typically, the matters raised may result in one or more of the following:

- no action required
- action being taken under other MDD policy or procedure
- an internal investigation under this policy
- a referral to the police or relevant statutory body
- a referral to MDD's external auditors
- a referral to the Charity Commission
- an independent enquiry.

Any MDD manager or senior officer receiving a potential whistleblowing concern must notify the Chief Operating Officer immediately that a concern has been raised and inform them of progress in resolving the concern.

11. Raising a concern externally

We strongly encourage you to exhaust the internal processes set out above in the first instances. In exceptional or urgent circumstances, however, or where, having made a

disclosure, you are unhappy with the outcome, you have a legal right to make a disclosure to prescribed bodies.

These include but are not limited to:

- the Charity Commission;
- HM Revenue & Customs;
- the Health and Safety Executive;
- the Financial Services Authority;
- the Office of Fair Trading;
- the Environment Agency
- office of the Scottish Charity Regulator
- fundraising regulator.

Similar to the rights and obligations of an employee, MDD reserves the right to make a referral to any of the above agencies without your consent.

12. Making a disclosure to the press

Disclosures to the press will not be considered reasonable and may constitute misconduct. As such, the matter might be treated as a disciplinary matter in accordance with our disciplinary and grievance policy and procedure.

13. Further help and assistance

If, at any stage in the procedure, you are unsure about what to do and would like independent advice, you can discuss your concern with someone at Protect which offers confidential free legal and practical advice on how people can raise concerns about malpractice at work.

They can also provide advice about what legal protection may be available to you.

You can email Protect at protect-advice.org.uk or phone them on their advice line: 020 3117 2520.