



PRCA

Employee Whistleblowing Policy & Procedure

1. Principles of whistleblowing

The PRCA is committed to creating an open and transparent workplace culture where concerns can be raised with management, and where staff who raise concerns are supported and treated fairly.

This policy aims to enable and encourage staff to raise concerns within the PRCA. It recognises a worker's legal rights to make a protected disclosure to certain prescribed persons or bodies under the Public Interest Disclosure Act 1998 and any subsequent legislation, as incorporated into the Employment Rights Act 1996.

It is important to the PRCA that any fraud, misconduct, malpractice or wrongdoing by workers or officers of the organisation is reported and properly dealt with. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. If any cases of wrongdoing are upheld, they will be seriously dealt with.

The PRCA encourages staff to use mechanisms within the PRCA and/or via its independently led Standards Committee for reporting malpractice or illegal acts or omissions by employees, contractors or ex-employees and ex-contractors. Employees will be listened to, and serious concerns will be investigated. These mechanisms seek to ensure that Whistleblowers can avoid reporting to anyone they think may be involved or may take action against them because they are Whistleblowing. Whistleblowing should be free of any intimidation or retribution.

The PRCA will ensure that all existing employees and managers receive induction on the policy and the same will be done for new employees, including temporary, casual and agency staff, work experiences, trainees and apprentices. Additionally, the PRCA will ensure that all members of staff are reminded about the policy once per year so that they remain familiar with whistleblowing law and how to use this policy.

2. Definitions and scope

This policy applies to all employees including temporary, casual and agency staff, work experience, trainees, and apprentices. Other individuals who work or have worked within the organisation, such as former staff are encouraged to use it. There will be a specific version of this policy for non-employees and former non-employees such as volunteers, the self-employed and contractors. They are encouraged to use that policy and will receive similar training on joining and reminders thereafter.

For the purpose of this policy, the PRCA recognises that whistleblowing is the passing on of information about wrongdoing at work. The whistle-blower must reasonably believe that they are acting in the public interest.

The statutory categories for wrongdoing are:

- a criminal offence (such as insurance fraud or tax evasion)
- a breach of any legal obligation
- a miscarriage of justice
- endangering an individual's health and safety

- damage to the environment
- deliberate concealment of information about any of the above.

Examples of wrongdoing might include (but are not restricted to):

- inappropriate behaviours and/or conversations not able to be challenged and addressed
- lack of, or poor, response to a reported employee wellbeing alert
- inadequate induction or training for staff in how to do their job safely and healthily
- unsafe working conditions or practices
- suspicions of fraud, such as expenses abuse or bribery and corruption
- a bullying culture (across a team or organisation rather than individual instances of bullying).

It is not necessary for the member of staff to have proof that wrongdoing is being, has been, or is likely to be committed. A reasonable belief is sufficient to disclose the concern. The member of staff has no responsibility for investigating the wrongdoing. It is the organisation's responsibility to ensure that an investigation takes place.

A member of staff who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

This policy is not for staff with concerns about their employment that affect only them – that type of concern is better suited to the grievance policy or complaints against staff or employee code of conduct at work policy which are part of the Staff Handbook and can be found [provide links].

The PRCA recognises employees may wish to seek advice and be represented by another individual, such as a lawyer or another person outside of the business, when using the provisions in this policy.

3. Processes, Roles and Responsibilities

The Management Board (on which the CEO sits but is not a member) and the Standards Committee (independently led) are responsible and accountable for this Whistleblowing Policy and Procedure.

They will:

- demonstrate commitment to developing an open culture within the organisation, through actions and strategy;
- receive and review annual reports on whistleblowing activity (the CEO will not be present);
- appoint designated officer/s to undertake activities below.

All staff have a duty to report wrongdoing (whistle blow) under the circumstances set out in section 2 of this policy.

Line managers are responsible for:

- ensuring all staff are aware of this policy and procedure and their responsibilities;
- fostering an open culture within PRCA;
- ensuring any whistleblower is not subject to detriment;
- escalating issues and engaging the support of designated officer/s where required.

The Management Board, led by the Chair have the lead responsibility for the whistleblowing procedure and for dealing with issues raised. They will:

- oversee and review the whistleblowing policy and procedure;



- investigating issues raised promptly and thoroughly;
 - providing advice and support to employees (potentially via a third party);
- ensure learning from whistleblowing cases is fed back to the wider organisation;
- ensure any staff training is delivered to avoid the issue repeating;
- informing all reported disclosures to the Standards Committee and the actions being taken;
- ensure the process is monitored and improved where required.

4. Designated officers

The following people have been nominated and agreed by the PRCA as designated officers for concerns under this procedure

- Chair of the Management Board – currently Ray Eglington
- Chair of the Standards Committee (who is a non-member of the PRCA) – currently Rita Dexter
- Honorary Vice President – currently Sarah Scholefield

These designated officers will act as an independent and impartial source of guidance/support to staff at any stage of raising a concern, with access to anyone in the organisation. On one receiving a Whistleblow, the others will be advised, and they will together as a Whistleblow action group to agree how to investigate the matter, and what external resources are needed so to do. Should the Whistleblow involve any of these individuals or roles, they will not be included in the Whistleblow action group.

5. Timings

The designated officers at PRCA will aim to acknowledge receipt any incident of whistleblowing within 24 hours or receiving it.

The designated officers will then start the process and set out a timeframe within which the complaint will be dealt with.

- ENDS -

This policy will be updated annually after the AGM when the designated officers may change. The policy will be the subject of employee training on joining PRCA and will form part of the employee's terms and conditions, with annual reminders issued thereafter.

Date	Status/Summary of Changes	Approved By	Signature	Next Review
November 2023				November 2024