

Whistleblowing

If you have difficulty with sight or hearing, or if you require a translated copy of this document, we would be pleased to provide this information in a form that suits your needs.

Glen Oaks HOUSING ASSOCIATION 	Policy number:	G17
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Our Vision, Mission Statement and Values

Glen Oaks' vision statement '**Where Communities Thrive**' and our mission statement '**Our aim is to provide good quality affordable housing and an excellent service. We will encourage resident participation and work with other agencies to regenerate our community**' provide the foundation for Glen Oaks Housing Association's commitment to its residents and the communities they live in.

This commitment is also demonstrated in the Association's values which were agreed following discussions with the Board and staff. Glen Oaks' values are fundamental to how we carry out our day-to-day activities.

Our values are:

respectful

we trust and respect our customers and each other

dedicated

we will give 100% commitment to our work

transparent

we will be open and honest about what we do

aspirational

we will strive to achieve the best we can for our communities

Equality & Diversity Statement

The Association is intent on ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; sex; marriage & civil partnership; race; religion or belief; sexual orientation; gender reassignment; pregnancy & maternity.

This document complies with the Association's equality & diversity policy.

The Association will regularly review this document for equal opportunities implications and take the necessary action to address any inequalities that result from the implementation of the policy.

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1.0 Introduction

- 1.1 Glen Oaks Housing Association is committed to the highest standards of openness, probity and accountability. As employees are often the first to realise that there may be something seriously wrong, Glen Oaks Housing Association expects those who have serious concerns about any aspect of the Association's work to come forward and speak up without fear of reprisal. We therefore recognise that it is an important aspect of accountability and transparency to provide a mechanism to ensure that no employee, Board member or stakeholder of Glen Oaks Housing Association feels at a disadvantage in raising legitimate concerns.
- 1.2 The Public Interest Disclosure Act, 1998, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. These concerns must be made in the 'public interest' as per the Enterprise and Regulatory Act 2013, in addition if a disclosure is not made in 'good faith' this will still be considered by an employment tribunal but compensation can be reduced by up to 25% in such circumstances.
- 1.3 Employers may also be held vicariously liable for workers who victimise colleagues for making a disclosure. Glen Oaks Housing Association will take all reasonable steps to protect workers from being victimised.
- 1.4 All employees, Board members and stakeholders working for, or acting on behalf of, Glen Oaks Housing Association are covered by this policy. The policy also applies to suppliers and those providing services under a contract with Glen Oaks Housing Association.
- 1.5 If you are a customer, member of the public or other service user, you should raise any concerns regarding 'Whistleblowing' directly with the Chief Executive, verbally or in writing marked 'Private and Confidential', or to the Chairperson of the Board.

2.0 Scope of Policy

- 2.1 This policy is designed to enable employees of Glen Oaks Housing Association to raise concerns internally and at a high level to disclose information that the individual believes shows malpractice or impropriety.

2.2 A number of policies are already in place, including Dignity at Work, and disciplinary and grievance procedures. This policy is intended to cover concerns that are in the public interest and may (at least initially) be investigated separately, but may lead to the instigation of other procedures. These concerns might include:

- Financial malpractice, impropriety or fraud.
- Bribery or corruption
- Failure to comply with a legal obligation or Statutes.
- Dangers to Health and Safety or the environment.
- Criminal activity involving Glen Oaks Housing Association, its staff, Board members or stakeholders.
- Professional malpractice.
- Improper conduct or unethical behaviour.
- Failure to meet legal obligations.
- Abuse of power or status.
- Deliberate attempts to conceal any of the above.

3.0 Legal Framework

- Public Interest Disclosure Act, 1998
- Enterprise and Regulatory Act, 2013
- Bribery Act 2010

4.0 Safeguards

4.1 Protection

4.1.1 This policy is designed to offer protection to those employees or Board members of Glen Oaks Housing Association who disclose such concerns provided the disclosure is made:

- in good faith;
- in the public interest;
- to an appropriate person/body; and
- that the individual has reasonable belief in the validity of the concerns being raised.

- 4.1.2 Glen Oaks Housing Association will not tolerate any harassment or victimisation (including informal pressures) and will take appropriate action to protect the individual when they raise a concern with the above provisions acknowledged.
- 4.1.3 In respect of any allegations of bribery or corruption, this policy enables employees or Board members to report such matters in a safe and confidential manner to a responsible Senior Officer or the Chairperson. Glen Oaks Housing Association will ensure that all allegations of bribery or corruption are properly investigated by properly qualified individuals and that the results of those investigations are reported back to the individual who made the original complaint.

4.2 Confidentiality

- 4.2.1 All concerns will be treated in confidence and every effort will be made not to reveal the individual's identity if they so wish. However, at the appropriate time the individual may need to come forward as a witness.

4.3 Anonymous Allegations

- 4.3.1 This policy encourages individuals to put their names to any disclosures they make. Concerns expressed anonymously are much less robust, but may never the less be considered at the discretion of Glen Oaks Housing Association.
- 4.3.2 In exercising this discretion the factors to be taken into account would include:
- The seriousness of the issues raised;
 - The credibility of the concern; and
 - The likelihood of confirming the allegation from attributed sources.
- 4.3.3 Anonymous complaints should not be ignored. It may be necessary for Glen Oaks Housing Association to arrange for the anonymous Whistleblower to speak to an independent investigator in confidence, with assurance given that the Whistleblower will not lose their job.

4.4 Untrue Allegations

- 4.4.1 If an individual makes an allegation that is not confirmed by the subsequent investigation, but that allegation is deemed to have been made 'in good faith', no action will be taken against them.
- 4.4.2 However, if the individual makes an allegation that is deemed to be made 'in bad faith', i.e. frivolously, maliciously or for personal gain, disciplinary action may be taken against them and this may be up to and including dismissal.
- 4.4.3 It should also be noted that under the provisions of the Enterprise and Regulatory Act, 2013, if a disclosure is not made in 'good faith' this will still be considered by an employment tribunal but compensation can be reduced by up to 25% in such circumstances.

4.5 Serious Allegation(s) made against a staff member, Board member or the Chief Executive

- 4.5.1 In the event of a serious matter being raised against any of the above, the person receiving the complaint must bring this to the attention of the Corporate Services Manager (CSM) immediately. This must be done in writing (email will suffice).

4.5.2 Staff Matter

The CSM will advise the Chief Executive, for information only at this stage, that a concern has been raised under the Whistleblowing policy.

The CSM will discuss the complaint with the relevant Director and advise them whether or not the Whistleblowing complaint should be notified to the Scottish Housing Regulator (SHR).

4.5.3 Board Member Matter

The CSM will advise the Chief Executive, for information only at this stage, that a concern has been raised under the Whistleblowing policy.

The Chief Executive will discuss the complaint with the Chairperson and advise him/her whether or not the Whistleblowing complaint should be notified to the Scottish Housing Regulator (SHR).

In either situation, it is critical that:

- The Chief Executive and/or Chairperson are kept fully informed as to progress with the investigation.
- All information is treated in strict confidence.
- Thorough investigations are completed as quickly as is reasonably practical.

The results of the investigation will be considered jointly by the Chief Executive and Corporate Services Manager, or the Chairperson and the Corporate Services Manager, bearing in mind the potential implications for the Association, before deciding whether to:

1. Advise the Whistleblower that there is no case to answer; or
2. Advise the Whistleblower that the matter is being dealt with and that it will be brought to a conclusion.

4.5.4 Chief Executive Matter

If the complaint is against the Chief Executive or is any way related to their actions, it should be addressed to the Chairperson who will investigate the matter.

A complaint against the Chief Executive may involve appointing a suitably qualified independent external investigator, depending on the circumstances of each case. It may also include convening a meeting of the Audit Sub-Committee, although this may follow after the initial investigation, to consider the outcome of the investigator's report.

5.0 Raising a Concern

5.1 First Step

5.1.1 The individual should raise concerns with their immediate line manager. This information will be passed on as soon as possible to the Chief Executive.

5.1.2 Any complaints will be investigated by the Chief Executive unless the complaint is against the Chief Executive or is in any way related to their actions. Where the complaint is related to the Chief Executive, it should be addressed to the Chairperson of the Board who will in turn appoint an independent person to investigate the allegations.

- 5.1.3 Although the individual is not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate that there are reasonable grounds for their concern.
- 5.1.4 The earlier the individual expresses their concern, the easier it is to action. The amount of contact between the persons considering the issues and the individual will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, Glen Oaks Housing Association will seek further information from the individual concerned.
- 5.1.5 Where any meeting is arranged, the individual can be accompanied by a trade union representative and also have the meeting off-site if they so wish.

5.2 Process

- 5.2.1 On receipt of a disclosure, the appropriate person (normally the Chief Executive or the Chairperson) will launch an investigation.
- 5.2.2 Reference will be made to the Scottish Housing Regulator's Guidance on Notifiable Events to determine if the Whistleblowing complaint should be notified to the Regulator, whether or not the complaint is dealt with internally or externally.
- 5.2.3 Depending on the circumstances surrounding the investigation, appropriate action will be taken in accordance with Glen Oaks Housing Association's existing policies and procedures, which may include disciplinary action.

5.3 Timescales

- 5.3.1 Once the investigator has completed the investigation it will be given to the individual who instructed the investigation. They will then write to the person who raised the concern within 5 working days and:
- Acknowledge that the concern has been received;
 - Indicate how the matter will be dealt with;
 - Give an estimate of how long it will take to provide a final response;
 - Supply the individual with information on staff support mechanisms; and
 - Inform the individual whether further investigation will take place and, if not, explain why.

- Advise the Whistleblower of staff support mechanisms available to them, and inform them that they will be expected to participate in the investigation as and when required.

5.3.2 The amount of contact between the persons considering the issues and the Whistleblower will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, the Association will seek further information from the Whistleblower.

5.3.3 Where any meeting is arranged, the individual can be accompanied by a trade union representative and also have the meeting off-site if they so wish.

6.0 Outcome of Investigation

6.1 Initial informal enquiries will be made to decide whether a formal investigation is appropriate and, if so, what form it should take. The overriding principle is the public interest.

6.2 Once the investigation has been completed and the report is received by the Chief Executive or Chairperson (as appropriate), a decision on what action to take will be considered. If there are reasonable grounds to substantiate the complaint, an appropriate procedure will be initiated.

6.3 This may include convening a meeting of the Audit Sub-Committee; convening a disciplinary panel; referral to the external or internal auditor or an external body such as the Police or Scottish Housing Regulator, or commissioning an independent inquiry.

6.4 The Association accepts that you need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform you of the outcome of any investigation.

6.5 The Association would hope that the Whistleblower will be satisfied with any action taken. Where an individual feels that their concern has not been dealt with appropriately, they can appeal the decision internally to the Chairperson of the Audit Sub-Committee.

6.6 If, after appealing internally, the individual is still not satisfied with the outcome, they can raise the issue with the appropriate external regulatory body as outlined in Appendix 1.

7.0 Distribution and Communication

7.1 This policy will be provided to every employee and Board member of Glen Oaks Housing Association, will be discussed at staff and Board induction, staff meetings, publicised on our staff notice boards, the Association's website and wherever else appropriate.

8.0 Policy Review

8.1 This policy will be included for information at the first Board meeting following the Annual General Meeting each year, in order that it can be brought to the attention of new Board members. Any revisions deemed necessary can be considered at that time, otherwise the policy will be reviewed by the Board every 3 years.

Appendix 1

List of Prescribed Persons (relevant organisations)

The Scottish Housing Regulator <i>The Scottish Housing Regulator regulates RSLs and local authorities that provide landlord, homelessness and factoring services. While it is not the Regulator's role to intervene in complaints between an individual and a regulated body, if they are notified of a very serious allegation they may gather information in order to determine whether they need to take action.</i>	0141 271 3810
Office of the Scottish Charities Regulator	01382 220446
Financial Conduct Authority	0800 111 6768
Environmental Health	01389 738674
Health and Safety Executive	0845 345 0055

Further Sources of Information

Other contacts to whom concerns may be raised (or for the person investigating to get advice) include:

Glen Oaks' Solicitors: TC Young (www.tcyoung.co.uk)	0141 221 5562
Glen Oaks' External Auditors: Alexander Sloan (www.alexandersloan.co.uk)	0141 204 8989
Glen Oaks' Internal Auditors: Henderson Loggie (www.hlca.co.uk)	0141 221 6807
EVH (www.evh.org.uk)	0141 352 7435
ACAS (www.acas.org.uk)	Helpline 08457 47 47 47
Public Concern at Work (www.pcaw.co.uk)	0207 404 6609
Unite the Union (www.unitetheunion.org)	0141 332 7231

Complaints about a regulated body

This factsheet provides guidance for tenants, members of the public and registered tenant organisations on making a complaint about a regulated body. It sets out what The Scottish Housing Regulator (the regulator) **can** and **can't** do about your complaint.

In this factsheet the term 'regulated body' means a social landlord that we regulate, including: housing associations, co-operatives, housing partnerships, housing partnerships and housing companies that are registered with us (registered social landlords); and local authorities that provide landlord, homelessness and factoring services.

Complaining about the activities of a regulated body

If you have a complaint about a regulated body, you should ask the organisation for a copy of its complaints procedure. You should make your complaint following this procedure to the point where your complaint is resolved or the procedure comes to an end.

If you have reached the end of the organisation's own complaints procedure and you are still not satisfied, you may want to refer the complaint to the Scottish Public Services Ombudsman at 4 Melville Street, Edinburgh EH3 7NS; telephone 0800 377 7330 fax or email: enquiries@scottishombudsman.org.uk. The Ombudsman has the statutory authority and powers to investigate a complaint.

What your landlord is expected to do

The Scottish Government's Social Housing Charter sets the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The Charter requires landlords to manage their businesses so that tenants and other customers find it easy to communicate with them and get the information they need about how and why it makes decisions and the services it provides.

Specifically in relation to complaints, landlords should make it easy for tenants and others to make complaints and provide feedback on services, and they should let people know what they have done in response to complaints and feedback.

The role of the regulator in dealing with complaints

Our role is to monitor and assess landlords' performance against Charter outcomes. We will use a variety of approaches to do this and inform the SPSO if we find that complaint handling by a landlord is inadequate through any of our regulatory engagement or activity. Our Regulatory Framework also sets out our approach to gathering information about complaints.

Our Regulatory Framework can be found at:

<http://www.scottishhousingregulator.gov.uk/publications/our-regulatory-framework>

As the regulator, it is not our role to intervene in complaints between an individual or a registered tenant organisation and a regulated body. It is the role of the Scottish Public Services Ombudsman to deal with individual complaints that cannot be resolved through a regulated body's complaints procedure (see 'Complaining about the activities of a regulated body' above). However, if the issue amounts to a Significant Performance Failure we may have a role to play. For more information about a Significant Performance Failure please see here

If, however, we are notified of a very serious allegation against a regulated body we may gather information to help us determine whether we need to take any action. It is not appropriate for us to become involved in complaints where legal action is underway. In some circumstances we may refer you to another regulator. For example, if your complaint is about a housing support service it may be more appropriate for you to contact the Care Inspectorate.

Appendix 3: Whistleblowing Procedures

a. **Guidance for staff or Board members who are notified of concerns**

1. If the person raising concerns is a staff member, ask whether they have sought independent advice. If they have not, you should still be prepared to listen to their concerns.
2. If you have any conflict of interest personally, you should suggest a more relevant person to speak to and also advise that person of your initial contact.
3. You should respect the confidentiality of the person raising the concern, but also advise them that they may have to speak up if the matter is to be dealt with properly.
4. You should be mindful of legitimate concerns the Whistleblower may have about their own safety and/or career.
5. You should ensure the Whistleblower is aware that raising unfounded allegations maliciously or frivolously is a disciplinary matter.
6. You should offer to report back about the outcome of the investigation and, where possible, on any action that is proposed.
7. Finally, you should notify and seek advice from the Association's Chief Executive or Chairperson. As described in the next section, the Chief Executive and/or the Chairperson will arrange for the concerns to be investigated.
8. If you are a Board member and the concerns that have been relayed to you concern the conduct of a member of staff, you should notify the Corporate Services Manager. If the concerns relate to the Chief Executive, you should contact the Chairperson who may contact the Association's solicitors for advice about how to proceed.
9. Victimising or deterring employees from raising a concern about malpractice is a disciplinary offence.
10. Anonymous complaints should not be ignored. If necessary, you should offer the Whistleblower the opportunity to speak to somebody outside the Association in confidence.

b. Investigation Procedures

11. Initial enquiries will be made by the Chief Executive (or a member of the Corporate Management Team acting on the instructions of the Chief Executive) to determine what needs to be done to investigate concerns raised under the Whistleblowing policy. The Chief Executive will be responsible for informing the Chairperson and/or Board of any concerns raised under the policy.
12. Upon completion of initial enquiries, the matters raised may be:
 - Further investigated by management, internal audit or through the disciplinary process.
 - Referred to the Police.
 - Referred to the Association's external auditor or solicitors.
 - Subject to an independent inquiry.
13. During the course of any investigations, contact with the person who has expressed concern will depend on the nature of the matters raised. If necessary, the Association may seek further information from the person who has expressed concern.
14. Where meetings are arranged with an employee who has raised concerns, the Association will:
 - Hold meetings away from the workplace, if this is preferred by the employee(s) who has/have raised concerns.
 - Allow the employee(s) to bring a Trade Union or professional representative or a friend if they wish.
15. The Association will do whatever it can to minimise any difficulties that individuals may face as a result of raising a concern. For instance, if somebody is required to give evidence in subsequent criminal or disciplinary proceedings, the Association will arrange for them to receive advice about the procedures involved.
16. A member of the Corporate Management Team or an Office Bearer of the Association will write to the person who has raised the concern within 5 working days.

Their letter will:

- Acknowledge that the concern has been received.
- Indicate how the Association proposes to deal with the matter.
- Give an estimate of how long it will take to provide a final response.
- State whether further investigations will take place and, if not, why not.

17. Subject to any legal constraints, the Association will inform the person who has expressed concern of the outcome of any investigations.

Appendix 4 - Board Information Note

1.0 Background

- 1.1 The Association hopes you will never need to use the advice provided in this note. But we also recognise that employees need clear guidance about how to report any concerns they might have about malpractice or wrongdoing, in any aspect of Glen Oaks Housing Association's work.
- 1.2 The Association's policy on Whistleblowing states its commitment to:
- Tackling malpractice and wrongdoing.
 - Ensuring that people with serious concerns can report these without fear of victimisation or discrimination, and in the knowledge that their concerns will be taken seriously and acted upon.
- 1.3 This note provides practical guidance about what you should do if you are ever approached directly by staff members with serious concerns, or if you yourself have serious concerns about malpractice or wrongdoing.

2.0 If you are approached by staff members expressing serious concerns

- 2.1 Never ignore concerns which are expressed to you.
- 2.2 Notify the Chief Executive and/or Chairperson immediately.
- 2.3 If the concerns are about the Chief Executive, notify the Chairperson who may contact the Association's solicitors for advice.
- 2.4 Respect the confidentiality of the staff member who has spoken to you. Make sure they know you intend to pass the information on to the Chief Executive and/or Chairperson and are comfortable with you doing this.

3.0 If you are concerned about malpractice or wrongdoing

3.1 Talk to the Association's Chairperson or Chief Executive

- 3.1.1 You can raise your concerns verbally or in writing. If you raise your concerns in writing, set out the reasons for your concerns as clearly as you can.

3.2 Professional Advisers

3.2.1 Glen Oaks Housing Association's auditors (internal and external) and solicitors are aware of the Association's Whistleblowing policy. They can also be contacted in confidence for advice and as a contact for raising concerns or starting investigations.

3.3 Raising your concerns outside the Association

3.3.1 The Whistleblowing policy allows you to raise your concerns within the Association, and to have them dealt with effectively.

3.3.2 It would be our wish that you had tried Steps 3.1 or 3.2 above before speaking to external parties. However, we recognise that in some circumstances, concerns could merit immediate reporting to the Police or to regulatory bodies such as the Scottish Housing Regulator (the Association's main regulator).

3.3.3 The Association respects the fact that somebody with very serious concerns could wish to contact one of these external parties in the first instance.

4.0 **Malicious or Frivolous Allegations**

4.1 Anyone who abuses this procedure by making allegations which are malicious, frivolous, or for their own personal gain will be subject to disciplinary action. If you make an allegation in good faith, but it is not confirmed by subsequent investigation, no action will be taken against you.

4.2 If you choose to report matters to the media without making any attempt to raise your concerns internally or to one of the external parties described above, this will be deemed to be a serious breach of the Code of Conduct, unless the Board is satisfied that it was reasonable for you to adopt that course of action.

Appendix 5 - Staff Information Note

1.0 Background

- 1.1 The Association hopes you will never need to use the advice provided in this note. But we also recognise that employees need clear guidance about how to report any concerns they might have about malpractice or wrongdoing, in any aspect of Glen Oaks Housing Association's work.
- 1.2 The Association's policy on Whistleblowing states its commitment to:
- Tackling malpractice and wrongdoing.
 - Ensuring that people with serious concerns can report these without fear of victimisation or discrimination, and in the knowledge that their concerns will be taken seriously and acted upon.
- 1.3 This note provides practical guidance about what you should do if you are ever in the position of needing to report suspected malpractice or wrongdoing.

2.0 If you are concerned about malpractice or wrongdoing

- 2.1 Five possible courses of action are set out below. We anticipate that employees would raise any concerns based on the sequence of events shown. We also recognise that circumstances could influence how employees might choose to raise any concerns, for example, you could legitimately choose to raise your concerns outside the Association's line management structures.
- 2.2 Seek Advice
- 2.2.1 We recommend that you should speak to your Trade Union representative or official before raising a concern under the Whistleblowing policy.
- 2.2.2 Alternatively, you can discuss your concern with a colleague first. You may find it is easier to raise the matter if there are two (or more) of you who have had the same experiences or concerns.

2.2.3 You may invite your Trade Union representative or a friend to be present during any meetings or interviews about the concerns you have raised.

2.3 Talk to your supervisor or line manager

2.3.1 As a first step, you should normally raise concerns with your immediate manager or their superior.

2.3.2 In some cases, you may be reluctant to do this, for example, depending on the seriousness and sensitivity of the issues involved, and who is suspected of the malpractice. If you wish to speak to another member of staff in the first instance, you can raise your concerns in confidence with the Corporate Services Manager, the Chief Executive or any other member of the Corporate Management Team.

2.3.3 You can raise your concerns verbally or in writing. If you wish to do so in writing, please set out the reasons for your concerns as clearly as you can.

2.4 Board or Audit Sub-Committee

2.4.1 If you feel that you cannot raise your concerns within the Association's staff structure, you may contact the Chairperson of either the Board or the Audit Sub-Committee.

2.5 Professional Advisers

2.5.1 The Association's auditors (internal and external) and solicitors are aware of the Whistleblowing policy and our wish to be open and accountable for our actions. They can also be contacted in confidence for advice and as a contact for raising concerns or starting investigations.

2.6 Raising concerns outside the Association

2.6.1 The Whistleblowing policy is intended to allow you to raise concerns within the Association, and to have them dealt with effectively.

- 2.6.2 It would be our wish that you had tried Steps 3.1 or 3.2 above before speaking to external parties. However, we recognise that in some circumstances, concerns could merit immediate reporting to the Police or to regulatory bodies such as the Scottish Housing Regulator (the Association's main regulator).
- 2.6.3 The Association respects the fact that somebody with very serious concerns could wish to contact one of these external parties in the first instance, or if they felt that their concerns had not been taken seriously or investigated within the organisation. If you intend to refer concerns to an external party because you are dissatisfied with the outcome of an internal investigation or inquiry, we recommend that you should first take advice (see 2.2 above).

3.0 Malicious or Frivolous Allegations

- 3.1 Anyone who is found to have abused the Whistleblowing procedures by making allegations which are malicious, frivolous, or for their own personal gain will be subject to disciplinary action. If you make an allegation in good faith, but it is not confirmed by subsequent investigation, no action will be taken against you.

4.0 Anonymous Allegations

- 4.1 We encourage you to put your name to your allegation whenever possible. Anonymous allegations may still be investigated, but it may be more difficult for the Association to examine them fully.