



LightForce International

Whistle Blowing Policy

This policy applies to all employees, trustees, interns, volunteers or those on work-placement working on behalf of LightForce International. Throughout the document, the term “worker” will apply to collectively define these groups.

LightForce International’s policy on Whistle-blowing

LFI’s policy on whistle-blowing has the following objectives:

- To provide direction to all LFI workers on what is unacceptable practice within LFI, and to provide a safe and secure environment to blow the whistle on unacceptable practice.
- To protect workers who raise a concern in good faith and who have a reasonable suspicion that the alleged malpractice has occurred, is occurring, or is likely to occur.
- To provide reassurance to those workers who raise concerns in good faith and with reasonable suspicion that they will not experience any repercussions for doing so.

This policy aims to make workers aware of their rights and responsibilities with regard to up-holding the values and standards of practice at LFI and how to raise concerns when these standards of practice are not up-held.

Whilst this is not an exhaustive list, malpractice would include the following:

- A criminal offence, including theft, fraud or corruption.
- A failure to comply with a legal obligation, (including but not limited to those under the Charity Commission or financial regulations).
- A miscarriage of justice.
- Accepting gifts which are intended to influence decision making.
- The endangering of an individual’s health and safety, and well-being: this would include towards staff member, worker or visitor to LFI.
- Damage to the environment or conduct which conflicts with LFI’s interests.
- Deliberate disregard or serious breach of LFI principles and values, including bullying and harassment, and discrimination.
- Deliberate concealment of information to any of the above.

NB: The behaviour that gives rise to the concern does not have to take place in the UK.

Responsibilities

The International Director is accountable for ensuring the effective implementation of this policy throughout LFI and representing LFI’s interests/concerns in the event of publicity or litigation resulting from a whistle-blowing allegation.

Line managers are responsible for ensuring that the principles of this policy are communicated and understood throughout their teams. They are also responsible for putting the policy into practice.

These responsibilities include:

- LFI Whistle-blowing Policy
- Ensuring that all concerns raised by workers are taken seriously where appropriate
- Ensuring that concerns are investigated properly, objectively and in a timely manner
- Ensuring that the worker is kept informed of progress
- Ensuring that action is taken to resolve the concern

How to raise a concern

- In the event that they suspect malpractice workers at LFI have a responsibility to inform someone who is able to do something about the problem.
- They must provide details about the malpractice immediately when they become aware.
- All attempts should be made to raise the concern internally in the first instance.
- Please see the attached worker guidance on raising a concern.

APPENDIX A

A Worker Guidance on whistle-blowing

Determining whether to use the Whistle-blowing Policy

This quick question section may help you to determine whether you should use the whistle blowing procedure.

1.1 Does the malpractice fall under one of the following?

- A criminal offence, including theft, fraud or corruption.
- A failure to comply with a legal obligation, namely those under the Charity Commission or financial regulations.
- A miscarriage of justice.
- The endangering of an individual's health and safety, and well-being: this would include towards staff member, worker or visitor to LFI.
- Damage to the environment or conduct, which conflicts with LightForce International's interests.
- Deliberate disregard or serious breach of LFI principles and values, including bullying and harassment, and discrimination.
- Deliberate concealment of information to any of the above.

1.2 Do you have genuine reason to believe that malpractice occurred either in the past, recently, or is likely to occur in the near future?

1.3 What details do you have?

Check that the details are not judgements or assumptions, but based on fact.

1.4 Do you feel vulnerable or at risk?

Letting someone know

2.1 As soon as you become aware of, or have good reason to believe that, malpractice either has occurred, is occurring or likely to occur by an employee or volunteer within LFI raise your concern with an appropriate member of staff within LFI UK.

In the first instance, this would normally be your immediate line manager. You can make a report either orally or in writing.

2.2 If the malpractice concerns your line manager, then raise your concern with their line manager.

2.3 If you believe the malpractice is within your line management structure then raise your concern with the Chair of the Board of Trustees, who will consider in discussion with the International Director how it will be investigated unless it directly refers to the International Director

2.4 If the malpractice is regarding health and safety, raise your concern with the International Director, who has delegated responsibility for health and safety matters within LFI. It is also advisable to inform your line manager at this point.

2.5 If you genuinely believe that you will be subjected to detrimental treatment if you report the concern to an appropriate person within LFI, or that making a disclosure to someone within LFI will result in destruction or concealment of evidence relating to the concern, or you believe that your concern was not dealt with satisfactorily by LFI, you may raise your concern with an external body. (Details can be found in the bibliography).

3. Providing details about your concern

3.1 As soon as you become aware of or suspect malpractice, you have a duty to inform an appropriate person of your concern. If it is later found that you were aware of malpractice and had withheld information, this may have serious consequences for you.

3.2 When reporting your concern, you will be required to give your name, your position, and details about the concern, including any evidence that you have to support the concern. This will enable the best possible investigation.

4. Your position

4.1 If you want to raise the matter in confidence please make this clear when you make the report so that the appropriate arrangements can be made. Alternatively, you may make a report anonymously but please note that it is much harder (and sometimes impossible) to investigate suspicions without having direct access to the individual who raised the concern. It is best to declare your identity if possible.

4.2 If you genuinely believe that malpractice has occurred, is occurring or likely to occur LFI will ensure that you do not suffer any disadvantage in the workplace as a consequence of raising your concern.

4.3 If you raise a concern which is later found that you knew to be false and / or raise a concern out of malice, then disciplinary action will be taken and may result in your dismissal. For those who the disciplinary process does not apply (for example volunteers), steps will be taken to terminate the relationship/ time with LFI.

5. Next steps

5.1 The concern will be investigated by the person to whom it is raised. All workers called upon to assist the investigation will have a duty to co-operate and may request that their concerns are treated in confidence: again such wishes will be respected.

5.2 The investigating manager will provide regular information to the worker who raised the concern on the progress of the investigation up until an outcome has been reached. Please note that this does not necessarily mean that the outcome of the investigation will be divulged to the worker, especially when relating the privacy of another individual.

5.3 The investigating manager will forward all original investigation material to the Board of Trustees for further action as appropriate and/or storage.

5.4 The investigating manager will monitor and ensure that appropriate steps are taken to address the cause for concern.

5.5 LFI will respect and heed any legitimate concerns about your own safety or career, and will seek not to disclose your identity without your express consent.

Any attempt to victimise an employee for having raised a concern about malpractice, or to deter anyone from raising such a concern, is a serious disciplinary offence.

5.6 We will do everything possible to keep your identity secret (if you so wish) but there may be circumstances when you may be needed as a witness (for example, if your report becomes the subject of a criminal investigation). Should this be the case, we will seek to discuss the matter with you at the earliest opportunity

APPENDIX B

External Sources of Information and Advice

Whilst this is not an exhaustive contact list, it aims to provide the key contacts in relation to LFI's business.

Charity Commission

The Charity Commission for England & Wales Matters in respect of the proper administration of charities and funds given or held for charitable purposes.

Charity Commission

Liverpool Head of Operations

2nd Floor

20 Kings Parade

Queens Dock

Liverpool,

L3 4DQ

Tel: 0870 333 0123 Fax: 0151 703 1556

The Commissioners for Her Majesty's Revenue & Customs

Value added tax, insurance premium tax, excise duties and landfill tax. The import of prohibited or restricted goods. Income tax, corporation tax, capital gains tax, petroleum revenue tax, inheritance tax, stamp duties, national insurance contributions, statutory maternity pay, statutory sick pay, tax credits, child benefits, collection of student loans and the enforcement of national minimum wage.

Her Majesty's Revenue & Customs

Cross Cutting Policy

Room 1E/04

1 Parliament Street

London,

SW1A 2BQ

Tel: free phone 0900 595 000 Fax: free fax 0800 523 0506

Email: customs.confidential@hmrc.gov.uk