



NEIMME Whistleblowing Policy

Approved by: NEIMME Council

Date: May 2019

1. Objective

To ensure NEIMME conducts its business under charity status with honesty and integrity and expects all NEIMME members and council members to maintain high standards in accordance with the Policies, Procedures and Royal Charter obligations.

2. Scope

Whistleblowing is the disclosure of a concern that has come to the attention of one of the NEIMME council members, members or those who have a working relationship regarding a danger, risk, malpractice or wrongdoing which affects others and may be in the public interest.

This Policy sets out the basis in which the NEIMME council officials will investigate whistleblowing concerns raised by members, YMG members or those with an interest in the running of the NEIMME.

However, NEIMME recognises that there may be occasions when behaviours or practices are unacceptable and as such this Policy enables personnel to disclose a concern of serious wrongdoing without fear of reprisal.

NEIMME will make this Policy available to all current and future members of the Institute.

3. Implementation

The following are intended to assist with the implementation of this Policy:

- Encourage personnel to feel confident in disclosing concerns internally and to question and act upon concerns relating to unacceptable behaviour;
- Establish a fair investigative procedure;
- Establish the means of receiving a response to such a concern;
- Provide topic awareness;
- Reassurance that a person who raises a concern is protected from possible reprisals or victimisation in good faith

4. Types of Practices or Behaviours

A separate Policy exists under 'Data Protection' – see NEIMME Policy.

A separate Policy exists under 'Safeguarding' see NEIMME Policy

Types of Practices or Behaviours that should be dealt with by this Policy may include:

- Criminal activity;
- Fraud, corruption and bribery;
- Negligence;
- Health and Safety issues;
- Failure to comply with legal or professional obligations or regulatory requirements;
- Risk to the Environment;
- Miscarriage of Justice;
- Mismanagement of or unauthorised use of funds and resources;
- The deliberate concealment of any of the above

5. Responsibilities

The senior officials of the council will be responsible for the full and fair implementation of this Policy and for any follow up actions that may manifest themselves during the raising of a concern.

NEIMME Council officials will:

- Create a climate of trust and be transparent;
- Not discriminate;
- Abide by relevant legislation;
- Encourage those who may have serious concerns to raise such a concern by whistleblowing;
- Operate this Policy in a fair manner;
- Maintain records;
- Take appropriate actions;
- Ensure the person raising a serious concern does not suffer any detriment in connection with their NEIMME relationship;
- Ensure the persons raising the disclosure / concern do not face retribution if the concern they disclose proves to be unfounded

6. Procedure for Disclosing, Investigating and Follow up Actions

Where applicable the person raising a concern should inform a member of the NEIMME council.

They are to inform a member of council and offer the following details:

- The background, history and detail of their concern;
- Names, dates and places where possible;
- The reason why they are concerned about the situation

It will be the duty of the person who received the concern to conduct initial enquiries seeking to establish the facts of the matter and assess whether the concern meets the definition of whistleblowing and therefore would require further and formal investigation.

If, following this initial enquiries it is determined that some concerns do not meet the definition, then this may be resolved by agreed actions.

Where a disclosure falls within the meaning of whistleblowing, then the NEIMME President and Secretary must:

- Investigate internally;
- Appoint an independent member of the NEIMME council to assist in the investigation;
- Refer the concern to the Police (where deemed necessary)

Where investigation is required then feedback should be given to the person who raised the concern with a 3 week period.

The detailed investigation is required to obtain relevant facts and no assumptions may be made. This may involve meetings, acquiring evidence and interviewing personnel.

Upon conclusion of the investigation the NEIMME Secretary will produce a written report which is to be held on file with other current and relevant NEIMME records.

If referred to the police an internal investigation will be delayed pending the outcome of the Police investigation.

It will not be possible to fairly conduct an investigation when a concern has been raised by anonymous allegations.

7. Protection of a 'Whistleblower'

A 'whistleblower' will not suffer any detriment, whether the concern was unfounded or not and NEIMME will not tolerate any harassment or victimisation.

Detriment in this format means subjecting them to any disadvantage because they blew the whistle and this may include:

- Failure to promote;
- Denial of training (as applicable);
- Closer monitoring;
- Blocking access to resources;
- Block promotion / demotion (as and where applicable);
- Disciplinary action (as applicable)

This Policy will be subject to the NEIMME review procedure as required.