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DOCTORS OF THE WORLD UK WHISTLEBLOWING POLICY

VERSION CONTROL			
Version	**Author**	**Date approved**	**Changes**
1	Pete Aldridge	23/5/2019	
2	Andrew Rawstron/Simon Tyler	05/06/2024	Extensive rewrite
3	Alexandra Lopoukhine	30/06/2026	Edits on names

1. Introduction 2
2. Scope 3
3. Personnel Responsible for the Policy 3
4. What is Whistleblowing? 3
5. Raising a whistleblowing concern 4
6. Confidentiality 4
7. Investigation & Outcome 5
8. If you are not satisfied 5
9. External disclosures 6
10. Protection & Support for the Whistleblowers 6
11. Contacts 6

1. Introduction

We are committed to conducting our activities with honesty and integrity, and we expect all staff and volunteers (who include trustees/directors) to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential to prevent such situations occurring and to address them when they do occur.

2. Scope

The aims of this policy are to encourage staff and volunteers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

To provide staff with guidance as to how to raise those concerns.

To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. Personnel Responsible for the Policy

3.1. The board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

3.2. The Whistleblowing Officer (Alexandra Lopoukhine) has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

3.3. The Whistleblowing Officer, in conjunction with the board, should review this policy from a legal and operational perspective at least once a year.

3.4. All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved.

Comments, suggestions, and queries should be addressed to the Whistleblowing Officer.

4. What is Whistleblowing?

4.1. Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity;
- Failure to comply with any legal [or professional] obligation [or regulatory requirements];
- Miscarriages of justice;
- Danger to health and safety and any harm or risk of harm to children or vulnerable adults;
- Damage to the environment;
- Financial fraud or mismanagement;

- Conduct likely to damage our reputation or financial wellbeing;
- Unauthorised disclosure of confidential information;
- Negligence; and
- The deliberate concealment of any of the above matters.

4.2. A whistle-blower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.

4.3. This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use the Staff Disciplinary Procedure, Volunteer Management Policy, Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.

4.4. If you are uncertain whether something is within the scope of this policy you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

5. Raising a whistleblowing concern

5.1. We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer.

5.2. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

5.3. However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- The Whistleblowing Officer (Alexandra Lopoukhine)
- The President of DOTW UK (Steven Lloyd)

Contact details are set out at the end of this policy.

5.4. We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

5.5. We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

6. Confidentiality

6.1. We hope that staff and volunteers will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to

keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

6.2. We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer or one of the other contact points listed in paragraph 4 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

7. Investigation & Outcome

7.1. Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information.

7.2. In some cases, we may appoint an investigator or team of investigators including staff or third parties with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

7.3. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

7.4. If we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower will be subject to disciplinary action.

8. If you are not satisfied

8.1. While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

8.2. If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 4.

9. External disclosures

9.1. The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

9.2. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

9.3. Whistleblowing concerns usually relate to the conduct of our staff or volunteers, but they may sometimes relate to the actions of a third party, such as a service user, supplier or service provider. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the other individuals set out in paragraph 4 for guidance.

10. Protection & Support for the Whistleblowers

10.1. It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff and volunteers who raise genuine concerns under this policy, even if they turn out to be mistaken.

10.2. Whistle-blowers must not suffer any detrimental treatment because of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

10.3. You must not threaten or retaliate against whistle-blowers in any way. If you are involved in such conduct, you may be subject to disciplinary action.

11. Contacts

Whistleblowing Officer(s)

1. Alexandra Lopoukhine (Executive Director)
   (alopoukhine@doctorsoftheworld.org.uk)

2. Steven Lloyd (Chair of the Board of Trustees)
   (slloyd@doctorsoftheworld.org.uk)

3. Protect; (Independent whistleblowing charity)
   Helpline: 020 3117 2520
   Website: https://protect-advice.org.uk/