

SPRA WHISTLEBLOWING POLICY

Last revised Feb 2020

Purpose and scope

SPRA are committed to creating and maintaining a culture of openness within our organisation so that individuals feel encouraged and confident to raise any concerns relating to suspected misconduct at an early stage.

We also recognise the negative effect which malpractice can have on the organisation, and therefore encourage Direct Contacts to raise genuine concerns, or any suspicions they may have concerning misconduct.

This Policy is intended to cover concerns that are made in the public interest. If the matter is of an individual, personal, discrimination, victimisation or harassment nature it should be pursued through the Grievance Procedure.

This Policy applies to all Direct Contacts with SPRA including and not exclusive of; members, people going through training, freelancers working on behalf of SPRA, directors and Council members. This Policy is non-contractual and may be amended by us at any time.

Protection

SPRA appreciate that those reporting concerns may be apprehensive. SPRA want to reassure any person reporting concerns that they will suffer no detrimental treatment as a result of voicing those concerns.

SPRA will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this Policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure.

Disclosures under this Policy

Direct Contacts can make a disclosure under this Policy if they have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice:

- Criminal activity
- Miscarriages of justice
- Practices endangering health and safety
- Practices damaging the environment
- Failure to comply with a legal obligation
- Bribery
- Financial malpractice, impropriety or fraud
- Failure to comply with any codes of practice or ethical rules covering the business
- Attempts to conceal any of the above

The malpractice can be past, present or prospective. Direct Contacts are encouraged to report suspected wrongdoing as soon as possible. No action will be taken against the Direct Contact if they raise genuine concerns even if the concern raised is not confirmed by any subsequent investigation.

Confidentiality and anonymity

Any disclosure made under this Policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to the person making the complaint.

SPRA will always encourage open disclosure, but will accept anonymous concerns should a Direct Contact prefer to do so. However, concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

How to make a disclosure

In the first instance the Direct Contact should bring the matter to the attention of CEO of the association. If the disclosure contains allegations about the CEO or the malpractice occurs at this level, the Direct Contact may make the disclosure directly to a member of the SPRA Council.

Investigation

Once a concern has been raised, SPRA will investigate this. If the complaint has not been made anonymously, the person making the complaint will be asked to attend a meeting as part of this investigation.

SPRA will keep the complainant informed as to the progress of the investigation, as far as is possible and appropriate bearing in mind any confidentiality obligations that apply. Please note that the complainant will not be given details of any disciplinary action taken unless SPRA consider this appropriate.

Dissatisfaction with the outcome of the process

If the complainant is dissatisfied with the outcome of the investigation, they should raise this with the Chairman of the SPRA Council, giving the reasons for their dissatisfaction. They will respond in writing notifying the complainant of the acceptance or rejection of the need for further investigation and the reasons for this.

Training

SPRA Direct Contacts will be made aware of their rights and responsibilities under this Policy. All key personnel within this policy will be fully briefed as to their role in supporting this Policy and the appropriate action to take in the event of any disclosure being made to them.

Breach of this Policy

SPRA may invoke the Disciplinary Procedure on any person found to have subjected a whistle-blower to any form of detrimental treatment. It may also be invoked if any person intentionally misleads SPRA in respect of any matter, breached this Policy in any other way and/or if SPRA believes that the person has made a false allegation maliciously.