

FUNDRAISING WHISTLEBLOWING POLICY FOR VOLUNTEERS

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1 Why we have this Policy

- 1.1 The IET runs its activities with integrity. All of us must work together to ensure that they remain untainted by improper activity, or allegations of it. Fundraising activities of certain charities have raised concerns publicly, and to reflect this, the Fundraising Regulator now requires charities to have a whistleblowing policy to enable volunteers to report any concerns they may have regarding the IET's fundraising practice.
- 1.2 The IET's reputation is one of our key assets. It's a trusted brand. Any allegation of improper conduct can damage it, making it difficult for us to engage with our members, government departments, educational institutions and corporate partners. Therefore it's vital that our fundraising practices are ethical and transparent.
- 1.3 This Policy is intended to ensure that:
 - 1.3.1 Any concerns regarding the IET's fundraising practice are dealt with as quickly as possible; and
 - 1.3.2 That any volunteer who raises a concern is protected from any harassment or disciplinary action, provided they acted in good faith.

2 Who and what this Policy applies to

- 2.1 This Policy applies to all volunteers, and to IET staff who deal with them.
- 2.2 There is a difference between whistleblowing and raising a grievance:
 - 2.2.1 whistleblowing is where an individual has a concern about a danger or illegality that has a public interest aspect to it, for example because it threatens customers, third parties or the public generally; but
 - 2.2.2 a grievance is a complaint that generally relates to an individual's own position or personal circumstances regarding their volunteering activities or those of another IET volunteer. This policy does not set out the procedure that applies to such general grievances. If an IET volunteer employee has a complaint about their own personal circumstances, then they should raise it with their main staff contact at the IET.

3 Overview of this Policy

- 3.1 This Policy should be followed when a concern is raised about an alleged malpractice, danger or illegality that affect others, and is commonly called 'whistleblowing'. Generally a whistleblowing complaint will relate to some malpractice which is of general concern or specific public interest.
- 3.2 It does not matter if an individual who raises a concern is mistaken about it - volunteers do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.
- 3.3 If malpractice is reported, initial enquiries may be made to resolve the issue informally if possible. If this is not possible, or if the volunteer has any legitimate concerns about raising the issue informally or feels that the matter is sufficiently serious that informal enquiries are not appropriate, the IET will take formal action to investigate and take steps to investigate, and escalate, the issue depending on severity.
- 3.4 The IET is committed to ensuring that all disclosures raised under this Policy will be dealt with appropriately, fairly and professionally.

4 The Policy itself

- 4.1 For this Policy, whistleblowing is the reporting of suspected malpractice, wrongdoing or dangers in relation to the IET's fundraising activities. These may include:
 - 4.1.1 Criminal offences;

- 4.1.2 Breach of any legal or professional obligation;
 - 4.1.3 Breach of the Fundraising Code of Practice; or
 - 4.1.4 Deliberately concealing any of the above.
- 4.2 A concern can be raised by telephone, in person, or in writing (including email). It is preferable if it is made in writing. Although the individual is not expected to prove the truth of their concern beyond doubt or provide evidence, the individual will generally need to provide the following as a minimum:
- 4.2.1 The nature of the concern and why the individual believes it to be true; and
 - 4.2.2 The background and history of the concern (where possible).
- 4.3 If malpractice is reported, initial enquiries may be made to resolve the issue informally if possible. If this is not possible, then procedure for disclosing information incorporates three stages. At each stage of the process, all parties will ensure that the matter remains strictly confidential. In raising a concern, volunteers must act in good faith and believe that what is being alleged is substantially true.
- 4.4 The three stages are:

Stage 1	Initial investigation
	<p>A volunteer wishing to raise an issue should take this up either orally or in writing with the member of IET staff they normally deal with.</p> <p>If that staff member is the person against whom the disclosure is made, the volunteer may go immediately to Stage 2.</p> <p>The staff member should investigate with the informant and document the facts surrounding the allegation. It should be made clear from the outset that the matter will be dealt with in confidence and that the informant will not suffer any detriment as a result of the disclosure being made. The investigation should take no longer than 5 working days.</p>
Stage 2	If the issues are not investigated at Stage 1, or the matter is too serious or sensitive, the volunteer may request that the matter be raised with the Director of Governance and External Engagement, the Chief Executive and Secretary or a Trustee
Exceptionally serious or sensitive matters	Where the volunteer deems the matter to be exceptionally serious, or sensitive they should go immediately to the Chief Executive and Secretary, or a Trustee.
Stage 3	On completion of the investigation, consideration should be given to the next appropriate course of action. The General Counsel should be contacted to consider the case in full and to decide on further action in line with the Public Interests Disclosure Act 1998 and other relevant good practice and policies.

	<p>Where there is a case to answer in relation to the disclosure ‘further action’ may include disciplinary proceedings for one or more parties involved in the matter disclosed. This should be dealt with in line with the Disciplinary Policy (in the case of staff) or Disciplinary Regulations (in the case of IET members) . The rights of the informant to confidentiality should remain protected where possible.</p> <p>The ‘whistle-blower’ will be informed where possible that action has been taken and the matter has been dealt with in accordance with IET procedures.</p> <p>The Chief Executive and Secretary will be informed of all matters in relation to ‘whistle-blowing’ and any course of action decided upon.</p> <p>If the individual believes that the appropriate action has not been taken then they should report the matter to the proper authority i.e. HMRC, FSA.</p>
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4.5 There are other possible avenues of disclosure:

4.5.1 Volunteers may also refer concerns to either the Internal Auditor or to the Chairman of the Audit and Risk Process Committee (an IET Deputy President, appointed by the Board of Trustees). The IET’s Internal Auditor is Christina Sampazioti, and she can be contacted by email on csampazioti@theiet.org. The Chair of the Audit and Risk Process Committee changes each year; the name of the current Chair can be found here: <http://www.theiet.org/about/people/boards-committees/constitution-17-18.cfm>

4.5.2 This Policy outlines an internal (IET) procedure. There are other avenues of disclosure outside of this internal procedure (e.g. the Whistleblowing charity, ‘Public Concern at Work’ – see details in Appendix A) for a volunteer who reasonably believes that they will be subjected to a detriment or victimisation if they ‘whistle-blow’ following the internal procedure. An example of reasonable justification for a volunteer to go outside of the internal procedure would be if they felt that evidence relating to the matter would be concealed or destroyed.

However, if for whatever reason, an individual feels they cannot raise their concerns internally and they reasonably believe the information and any allegations are substantially true, the law recognises that it may be appropriate for them to raise the matter with another prescribed person, such as a regulator or professional body or an MP. A list of the relevant prescribed people and bodies for this purpose and the areas for which they are responsible is available from Public Concern at Work (see Appendix A) and on the GOV.UK website at <https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>.

If you have a concern regarding any of the IET’s fundraising practices which cannot be considered internally, you can contact the Fundraising Regulator <https://www.fundraisingregulator.org.uk/make-a-complaint/complaints/> . Note that if you do so, you will be asked whether or not you are happy for your details to be shared with the IET, and that the Fundraising Regulator is not a prescribed body.

- 4.5.3 However, to ensure the protection of all our volunteers and staff, should the individual go outside of the internal procedure without reasonable justification or raise a concern frivolously, maliciously and/or for personal gain and/or make an allegation they do not reasonably believe to be true and/or made in the public interest, the IET may resort to disciplinary action under its Code of Conduct and Disciplinary Regulations. This may also be the case where the internal disclosure proves to be unfounded and not made in good faith.
- 4.6 The IET strongly encourages any individual to seek appropriate advice before raising a concern to anyone external
- 4.7 The IET is committed to good practice and high standards and to being supportive to volunteers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 4.8 Any individual raising a genuine concern must not suffer any detriment as a result of doing so. If an individual believes they have suffered such treatment, they should inform the Chair of the Volunteer Engagement Board immediately.
- 4.9 No volunteer or member of staff must threaten or retaliate against an individual who has raised a concern and the IET will not tolerate any such harassment or victimisation. Any person involved in such conduct may be subject to disciplinary action.

5 What happens if you do not follow this Policy

- 5.1 If the IET is not made aware of any suspected wrongdoing in its fundraising practices, and such wrongdoing is subsequently proven, the IET is at risk of public censure by the Fundraising Regulator or the Charity Commission. This will damage the IET's reputation.
- 5.2 If this Policy is not followed in relation to any concern raised, there is a risk that any investigation into the matter is compromised.

6 Queries and comments

- 6.1 If you have any queries regarding how this Policy works in practice, or comments or suggestions as to how it could be improved, please contact the IET's Fundraising and Campaign Development Manager.

APPENDIX 1
PUBLIC CONCERN AT WORK: THE WHISTLEBLOWING CHARITY

- IET volunteers who are contemplating making public disclosure may wish to approach 'Public Concern at Work' (PCaW). Its objective is to safeguard the public interest by empowering individuals to speak up about wrongdoing in the workplace and helping organisations to address risk responsibly. The charity is wholly independent of Government. PCaW is recognised as a legal advice centre by the Bar Council and the Law Society. Since its establishment in 1993 PCaW has successfully advised on fifteen hundred cases.
- Through its helpline (telephone 020 7404 6609 or email helpline@pcaw.co.uk), PCaW's lawyers provide confidential advice, free of charge, to people who are concerned about wrongdoing at work but who are not sure whether to, or how to, raise their concerns. Examples of the wrongdoing about which PCAW can give advice are fraud, public dangers and risks to consumers. For persons who are in this position, PCAW aims to help them identify how best to raise their concerns, while minimising any risk to them and maximising the opportunity for any wrongdoing to be addressed.
- PCaW also provide information about how PIDA operates. It does not take cases or represent clients, but for persons wishing to make claims under PIDA and needing help to do so it will give information on other useful sources of advice.

Information about PCaW is given on its website at: <http://www.pcaw.co.uk/>

APPENDIX 2
CONTROL SHEET

IET Policy: Fundraising Whistleblowing for Volunteers

Category of Policy: Volunteers

Effective Date	Approved by	Author
November 2017	Alison Carr	Dom Pickersgill
Date of last review	Reviewed by	Date of next review
12 June 2020	Dom Pickersgill	September 2022

Distribution	All volunteers via volunteer gateway All staff via intranet
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Change history			
Version	Author	Date	Summary of changes
1.0	Dom Pickersgill	October 2017	First version.
1.1	Dom Pickersgill	December 2018	Minor typos corrected; missing job title inserted in Stage 3, change reference to Director of G&P to G&EE
1.1	Dom Pickersgill	12 June 2020	No changes