Western Health and Social Care Trust

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RAISING A CONCERN IN THE PUBLIC INTEREST (WHISTLEBLOWING) POLICY

October 2026

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GLOSSARY OF TERMS

- **Health and Social Care Shared Values** – the shared values of Working Together, Excellence, Openness & Honesty and Compassion as agreed and used across the HSC Trusts.

- **Whistleblowing** – a term which is often used to describe raising concerns in the public interest. Throughout this document the phrase raising concerns in the public interest is used however it should be noted that in some other referenced material, the term whistleblowing is used.

- **Raising Concerns In The Public Interest** – this term is preferred to the term Whistleblowing as it is the term referred to in the legislation. In reality both terms are used interchangeably.

- **Raising Concerns In The Public Interest Advocates** – persons within the Trusts who are trained to provide a range of services with respect to raising concerns in the public interest.

- **Staff And Others** – as this policy applies to a broad range of staff, agency workers, contractors etc. and also applies to volunteers and members of the public, the phrase 'staff and others' is used to describe the range of people who can utilise this policy. There are some legal provisions that will not apply to volunteers or members of the public and this is covered in the section on Legal Framework.

- **Non-Executive Director (NED)** – member of Trust Board.

- **Trust Board** – a group of Non-Executive Directors who are constituted to perform roles on behalf of the Department of Health.

- **Northern Ireland Audit Office (NIAO)** – the audit office for NI public sector organisations.

- **Fraud Response Plan** – a specific plan for dealing with allegations or actual fraud in public sector organisations.

- **Public Interest** – means it must affect others, i.e., the general public, however, does not necessarily mean that a large number of people need to be affected or interested.
- **PROTECT** – an independent charity who can be contacted for advice.

RAISING CONCERNS IN THE PUBLIC INTEREST

1. Introduction

At one time or another staff and others may have concerns about what is happening within the Trust. The Western Health & Social Care Trust (thereafter referred to as the Trust) wants staff and others to feel able to raise their concerns in the public interest with relevant managers at any time. The Trust expects all managers to listen to those concerns, take them seriously and take action to resolve the concern, either through providing information which gives assurance or taking appropriate action to resolve the concern. However, when a concern raised in the public interest appears to be potentially serious because it is about a possible danger, professional misconduct or financial malpractice, illegality or wrongdoing that might affect patients, colleagues, or the Trust itself, it can be difficult to know what to do.

The Trust recognises that many issues are raised by staff and addressed immediately by line managers – this is very much encouraged. This policy is aimed at those issues and concerns raised in the public interest which **remain unresolved, require help to get resolved or are about serious underlying concerns**.

Raising concerns in the public interest refers to staff and others reporting suspected wrongdoing at work, for example, concerns about patient safety, health and safety at work, environmental damage or a criminal offence, such as fraud.

Staff and others may be worried about raising such issues in the public interest and may think it best to keep it to themselves, perhaps feeling it is none of their business or that it is only a suspicion. Moreover, staff and others may also feel that raising the matter would be disloyal to their colleagues, to managers or to the organisation. It may also be the case that they have said something but found that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next. It is important to remember too that healthcare professionals may have a professional duty to report a concern therefore**, if in doubt, please raise it**.

Rather than wait for proof, staff and others should raise the matter when it is still a concern. If something is troubling a member of staff or others, and they think the Trust should know about or look into, they should let the Trust know. The Trust has

implemented these raising concerns in the public interest arrangements for staff and others to raise any concern in the public interest where the interests of others or the organisation itself are affected or are at risk.

2. Aims and Objectives

The Trust is committed to running the organisation in the best way possible. The aim of this policy is to promote a culture of openness, transparency and learning in line with the HSC shared values which at the same time:

- reassures staff and the public that it is safe and acceptable to speak up;
- upholds patient confidentiality;
- contributes towards improving services;
- assists in the prevention of fraud and mismanagement;
- demonstrates to all staff and the public that the Trust is ensuring its affairs are carried out ethically, honestly and to high standards;
- provides an effective and confidential process by which individuals can raise concerns in the public interest so that patients, clients and the public can be safeguarded.

The roles and responsibilities in the implementation of this policy are set out at **Appendix A**.

3. Scope

The Trust recognises that existing policies and procedures (e.g. Disciplinary Policy and Procedure, Grievance Policy and Procedure, Conflict, Bullying and Harassment Policy, the Complaints Procedure) may not always be appropriate for concerns raised in the public interest.

This policy provides a structure for raising concerns in the public interest where the interests of others or of the organisation itself are at risk.

It applies to the following groups:

- Employees of the Trust, including permanent, temporary and bank staff;
- Students in training/placements;
- Independent contractors engaged to provide services;
- Volunteers;

- Agency workers;
- Members of the public.

Examples may include:

- malpractice or ill treatment of a patient or client by a member of staff;
- where a potential criminal offence has been committed, is being committed or is likely to be committed;
- suspected theft or fraud;
- breach of Standing Financial Instructions;
- disregard for legislation, particularly in relation to Health and Safety at Work;
- the environment has been, or is likely to be, damaged;
- failing to declare a conflict of interest;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- showing undue favour over a contractual matter or to a job applicant;
- research misconduct; or
- information on any of the above has been, is being, or is likely to be concealed.

This list is not intended to be exhaustive or restrictive

If staff or others feel something is of concern, and it is something which they think is in the public interest that the Trust should know about, or look into, they should raise a concern. If however an employee of the Trust wishes to make a complaint about their employment, or how they personally have been treated, they should follow the Trust's Grievance Policy and Procedure, or Conflict, Bullying and Harassment Policy in relation to concerns pertaining to perceived Bullying and/or Harassment (which can be obtained on the HR Knowledge Hub here).

This Policy complements professional and ethical rules, guidelines and codes of conduct. It is not intended to replace professional codes and mechanisms which allow questions about professional competence to be raised. However, such issues can be raised under this process if no other more appropriate avenue is apparent. The Trust's Complaints team and Employee Relations team are available for advice and may direct individuals to a more relevant avenue for progressing their concern.

4. Suspected Fraud

If a concern is about possible fraud or bribery, the Trust has a number of policies available in which to process concerns of this nature, to include the Trust's Fraud Policy, Fraud Response Plan and Anti-Bribery Policy (available on the Trust's website - https://westerntrust.hscni.net).

4.1. Avenues for Reporting

The Trust has available a number of avenues by which staff can raise suspicions of fraud. These are detailed below and in the Trust's Fraud Response Plan. Concerns should be raised initially with the appropriate line manager who will inform the Fraud Liason Officer. However, there may be occasions where it is not deemed appropriate to inform the line manager, in these circumstances the suspicion should be reported to any of the following:

- Fraud Liaison Officer directly
- Director/Assistant Director
- Director of Finance
- Head of Internal Audit
- The confidential HSC Fraud Hotline 0800 096 33 96
- Online report https://cfps.hscni.net/report

Any concerns of potential fraud which arise during the course of a HR Employee Relations investigation process will be raised with the Fraud Liaison Officer in all instances.

On receipt of a concern relating to fraud or bribery, the Trust will notify Counter Fraud Services (CFS) in the first instance with the view to CFS carrying out an initial investigation.

Whilst the Trust would recommend all concerns of this nature should be raised internally in the first instance, employees of the Trust can also contact the regional HSC Fraud Reporting Hotline on **0800 096 33 96,** or report their suspicions online via https://cfps.hscni.net/report. These avenues are managed by BSO Counter Fraud and Probity Services (CFPS) on behalf of the HSC and reports can be made on a confidential basis.

The Trust's Fraud Response Plan will be instigated immediately on receipt of any reports of a suspicion of fraud or bribery.

The prevention, detection and reporting of fraud and bribery and other forms of corruption are the responsibility of all those working for the Trust, or under its control. The Trust expects all staff and third parties to perform their duties impartially, honestly, and with the highest integrity.

5. Our Commitment to Staff

5.1. Safety of Whistleblowers

The Trust Board, Corporate Management Team, Chief Executive, managers and trade unions/professional organisations are committed to this policy. If a member of staff raises a concern in the public interest under this policy, they will not be at risk of losing their job or suffering any detriment (such as victimisation). The Trust will not tolerate the harassment or victimisation of anyone who raises a concern in the public interest.

The Trust expects staff to raise concerns about malpractices. If any action is taken that deters any member of staff from raising a concern in the public interest or victimises them, this will be viewed as a disciplinary matter.

Provided staff or others are raising a concern in the public interest honestly and reasonably believe that the information and associated concerns are substantially true, it does not matter that they are mistaken, or if there is an innocent explanation for their concerns; they will be protected under the law if they are raising a concern in good faith. Whilst it is uncommon for concerns to be raised where the individual is aware that the concern is untrue, if staff or others raise a matter which they know to be untrue, protection under the law cannot be guaranteed, and the Trust reserves the right to take disciplinary action, if appropriate.

5.2. Confidentiality

With these assurances, the Trust hopes that staff and others will raise concerns openly in the public interest. However, the Trust recognises that there may be circumstances when staff or others would prefer to speak to someone in confidence first. If this is the case, they should indicate this when raising their concern.

Where possible, the Trust is committed to maintaining confidentiality for everyone involved in a concern. This includes the person raising the concern and the person(s) whom the concern is about. As far as possible, confidentiality will be maintained throughout the process and after the issue has been resolved.

If a whistleblower asks for their identity not to be disclosed, the Trust will not do so without their consent, unless required by law. Staff and others should however understand that there may be times when the Trust will be unable to resolve a concern without revealing their identity, for example, where their personal evidence is essential. In such cases, the Trust will discuss this with the whistleblower, and whether/how the matter can best proceed.

5.2 Anonymity

The Trust will consider anonymous concerns in a similar manner as those which are not anonymised. However, if the whistleblower does not disclose their identity, it will be much more difficult for the Trust to look into the matter, and it will also not be possible to protect their position or give them feedback. Further, without additional evidence, it may be difficult to investigate such complaints properly in order to establish the facts. For these reasons it is not best suited to deal with concerns raised anonymously.

6. Raising a Concern

If staff or others are unsure about raising a concern in the public interest, they can get independent advice at any stage from their trade union/professional organisation, or from one of the listed organisations as outlined at Section 7 (page 13). Staff and others should also remember that they do not need to have documentary evidence before raising a concern in the public interest, only a reasonable belief that an act of wrongdoing has occurred, or that there has been a deliberate attempt to cover up a wrongdoing. However, when raising a concern, staff or others should explain as fully as possible the information or circumstances that gave rise to the concern.

If a member of staff or others remain unsure about raising a concern in the public interest, they can get independent advice from PROTECT, an independent charity (see contact details under Independent Advice at paragraph 6.3 below).

6.1. Who Should Employees Raise a Concern With?

In many circumstances the easiest way for an employee to raise a concern will be to raise it directly with their line manager, lead clinician or tutor. In situations where the concerns relate to the line manager, staff should raise these concerns with their line manager's manager, and so on. Where staff do not think it is appropriate, or it has failed to resolve the matters satisfactorily, they can contact one of the following people:

- one of the raising concerns in the Public Interest Advocates – see details on the Trust's Raising Concerns Toolkit Here
- their Trade Union Representative.

If the staff member still feels their concerns need to be escalated after this, they can contact the HR Employee Relations Department on (028) 71320126, or the Director of Human Resources and Organisation Development at karen.hargan@westerntrust.hscni.net who has responsibility for raising concerns in the public interest within the Trust.

All of those listed as key raising concerns contacts have been trained in receiving and identifying how best to respond to concerns in the public interest, and will provide staff with information about where they can go for more support.

If for any reason a member of staff does not feel comfortable raising their concern internally, they can raise concerns with external bodies (see section 7 below). If exceptionally, the concern is about the Chief Executive, then it should be made (in the first instance) to the Trust's Chair, Mr Brian Telford, who will decide on how the concern raised should progress. Mr Telford can be contacted via telephone: (028) 71611197, or via email at brian.telford@westerntrust.hscni.net.

In cases where the Raising Concerns relates to a Non-Executive Director of the Board, the employee can expect this Policy and Procedure to be applied, and they may raise their concern with the Chair of the Trust Board or their nominee. In cases where the Raising Concerns relates to the Chair of the Board, they may raise the concern with a Non-Executive Board member nominated to deal independently with the matter relating to the Chair. Details of the nominated Non-Executive Director can be obtained from the Director of HR or Chief Executive. Resolution of concerns in respect of Non-

Executive Board members will follow Annex 5 of the Partnership Agreement between the Western Health and Social Care Trust and the Department of Health.

6.2. Who Should Members Of The Public Raise A Concern With?

In many circumstances, the easiest way for a member of the public to raise a concern will be to raise it directly with the relevant manager with responsibility for the service.

Alternatively, members of the public may wish raise their concerns with the Trust's Complaints Department on (028) 71611226, or by email to complaints.department@westerntrust.hscni.net where consideration will be given to the most appropriate avenue for the concern to be considered.

6.3. Independent Advice

If staff are unsure whether to use this Policy, or if they require confidential advice at any stage, they may contact their trade union/professional organisation, Trust Whistleblowing Advocates or the Trust's Employee Relations Department.

Advice is also available through the independent charity (PROTECT) on (020) 31172520 or https://protect-advice.org.uk/.

6.4. How Should Concerns be Raised?

Staff and others can raise their concerns in the public interest via the appropriate avenue set out above, in person, by phone or in writing (including email).

The individual raising the concern will be expected to explain as fully as they can the information and circumstances that gave rise to their concerns. If individuals wish to submit their concerns in writing, they should set out the background and history of the concerns, giving where possible:

- Names, including witnesses;
- Dates the concern(s) arose;
- Location(s), i.e. facility or ward:
- Documentary evidence if available; and
- The reason(s) why they are particularly concerned about the situation.

7. Raising A Concern Externally

The Trust hopes that this Policy reassures staff and others of its commitment to have concerns raised in the public interest under the policy taken seriously, and where appropriate and/or necessary fully investigated, and to protect an individual who raises such concerns in the public interest.

Whilst there may be occasions where individuals will wish to report their concerns to external agencies or the PSNI, the Trust would hope that the robust implementation of this policy will reassure staff and others that they can raise such concerns internally in the first instance.

However, the Trust recognises that there may be circumstances where individuals can raise a concern in the public interest with an outside body as specified in The Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014, which can be viewed at https://www.legislation.gov.uk/nisr/2014/48/schedule/made for a full list of contacts.

Disclosure to these organisations/persons will be protected, provided staff and others honestly and reasonably believe the information and associated concerns are substantially true.

The Trust would prefer for staff and others to raise a concern with the external agencies listed above than not at all. PROTECT, relevant trade union/professional organisation or Whistleblowing Advocate will be able to advise staff or others on such an option, and on the circumstances in which they may be able to contact an outside body safely.

8. The Media

Individuals may consider going to the media in respect of their concerns if they feel the Trust has not fully addressed these. Staff and others should carefully consider any information they choose to put into the public domain to ensure that patient/client confidentiality is maintained at all times. The Trust reserves the right to take disciplinary action if patient/client confidentiality is breached by staff.

Communications with the media are co-ordinated by the Communications Department on behalf of the Trust. Any member of staff approached by the media should direct them to the Trust's Communication Department in the first instance.

9. Conclusion

While the Trust cannot always guarantee that they will respond to all matters in the way that individuals might wish, the Trust will strive to handle the matter fairly, impartially and thoroughly. By using these raising concerns in the public interest arrangements, staff and others will help the Trust to achieve this.

Please note, this document has been developed to meet best practice and comply with the Public Interest Disclosure (NI) Order 1998 (as amended) (the Order) which provides employment protection for raising concerns in the public interest.

The Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014 gives significant statutory protection to staff and others who disclose information reasonably in the public interest. To be protected under the law an employee or others must act with an honest and reasonable belief that the matters specified in the concern raised occurred, is occurring or is likely to occur. Disclosures may be made to certain prescribed persons or bodies external to the Trust listed in the Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014.

10. Appendices

Appendix A – Roles and Responsibilities
Appendix B – Procedure for Raising a Concern
Appendix C – Advice for Managers
Appendix D – Raising Concerns in the Public Interest Whistleblowing Process
Appendix E - Raising a Concern in the Public Interest Toolkit

11. Equality, Good Relations, Human Rights & DDA

This Policy has been drawn up and reviewed in the light of Section 75 of the Northern Ireland Act (1998) which requires the Trust to have due regard to the need to promote equality of opportunity. It has been screened to identify any adverse impact on the 9 equality categories.

The policy has been **screened out** without mitigation or an alternative policy proposed to be adopted.

12. Personal & Public Involvement (PPI) / Consultation Process

The Western Health & Social Care Trust confirms that a Public Consultation was carried out by Department of Health and that Trade Union side were consulted.

13. Alternative Formats

This document can be made available on request on disc, larger font, Braille, audio-cassette and in other minority languages to meet the needs of those who are not fluent in English.

14. Sources Of Advice In Relation To This Document

The Policy Author, responsible Assistant Director or Director as detailed on the Policy title page should be contacted with regard to any queries on the content of this Policy.

15. Policy Sign Off

Lead Policy Author: _____ Date:_____

Director of HR: _____ Date:_____

APPENDIX A:
ROLES AND RESPONSIBILITIES

The role of the Western Health & Social Care Trust Board (including the designated Non-Executive Director (NED))

- To have responsibility for oversight of the culture of raising concerns in the public interest within their organisation in accordance with the HSC Board Member Handbook (sections 4.12)[1].

The Western Health & Social Care Trust

- To listen to staff and others, consider lessons learned and strive to improve patient care;
- To ensure that this policy enables concerns raised in the public interest to be dealt with effectively;
- To promote a culture of openness and honesty and ensure that issues are dealt with responsibly and taken seriously;
- To ensure that employees and others who raise concerns in the public interest do not suffer any detriment for doing so unless other circumstances come to light which require this, e.g., where an individual knowingly raises an issue regarding another member of staff which they know to be untrue; and
- To share learning, as appropriate, via our shared learning procedures.

Directors

- All Directors to ensure effective monitoring and timely implementation of relevant recommendations arising from raising concerns investigations within their Directorate.
- Directorate monitoring should include details of:
  - Number of recommendations made, agreed implementation dates, responsible officers and progress and status (implemented/outstanding);
  - Lessons learned and how these have been shared, where applicable;
- Update the HR Raising Concerns Manager on progression of recommendations to enable corporate oversight.

[1] https://www.health-ni.gov.uk/publications/hsc-board-member-handbook

Managers

- To take seriously any concerns raised with them in the public interest and consider them fully and fairly and respond appropriately, taking any necessary and appropriate action;
- To recognise that raising a concern in the public interest can be a difficult experience for some staff and others and to treat the matter in a sensitive manner if required;
- To seek advice from other professionals within the Trust where appropriate.
- To notify the HR Employee Relations Department of any concerns raised in the public interest which require formal progression, in order to ensure they are registered on the central raising concerns register, and to seek advice on how to progress these concerns;
- To invoke the formal procedure and ensure the HR Employee Relations Department are informed, if the issue is appropriate;
- To ensure employees who have raised a concern have access to personal support through, for example, their employee assistance programme (e.g., Inspire etc.) since raising their concern in the public interest may be stressful; and
- To ensure feedback/learning at individual, team and organisational level on concerns raised in the public interest and how they were resolved.

Raising Concerns in the Public Interest Advocate

- To ensure that any safety issue about which a concern has been raised is dealt in accordance with the procedures promptly and escalated appropriately through all management levels;
- To intervene and, if appropriate, escalate if there are any indications that the person who raised a concern in the public interest is suffering any detriment; and
- To work with managers and HR to address the culture and tackle any obstacles to raising concerns in the public interest.

All Members of Staff

- To recognise that it is their duty to draw to the Trust's attention any matter of concern in the public interest;

- To adhere to the procedures set out in this policy; and
- Where possible, to maintain the duty of confidentiality to patients and the Trust and consequently, where any disclosure of confidential information is to be justified, staff should first, where appropriate, seek specialist advice for example from a representative of a regulating organisation such as the Nursing & Midwifery Council or the General Medical / Dental Council.

Role of Trade Unions and Other Professional Bodies

All staff have the right to consult and seek guidance and support from their Professional Organisations, Trade Union or from statutory bodies such as the Nursing & Midwifery Council, the General Medical Council, Health Professional Council and the Northern Ireland Social Care Council.

APPENDIX B:
PROCEDURE FOR RAISING A CONCERN

Informal - Manager

If a member of staff or others have an honest and reasonable belief that a concern, which is in the public interest, about malpractice, risk, abuse or wrongdoing has occurred, is occurring, or is likely to occur, then the matter should be raised informally in the first instance with their line manager (or lead clinician or tutor), if a member of Trust staff, or with the relevant manager with responsibility for the service. This may be done verbally or in writing.

Staff and others are entitled to support from a trade union/trusted colleague, or Whistleblowing Advocate to assist them in raising their concern in the public interest.

Informal – Alternative to Manager

If a member of staff or others feel unable to raise the matter with their line manager (or lead clinician or tutor), or relevant service manager, for whatever reason, they should raise the matter with one of the Trust's whistleblowing advocates, or a more senior manager from within the Trust.

A list of the Advocates and their contact details can be found within the Whistleblowing Toolkit, or by clicking at Appendix E.

The Advocates have been given special responsibility and training in dealing with concerns raised in the public interest. They will:

- (where possible) treat any concern confidentially unless otherwise agreed;
- ensure staff and others receive timely advice on how best to progress their concern;
- escalate to the appropriate person any indications that staff are being subjected to detriment for raising their concern in the public interest;
- remind managers of the need to give staff and others timely feedback on how their concern is being dealt with.

Whilst it would be the preference of the Trust for staff and others to raise the matter openly, if a member of staff wants the matter dealt with in confidence, they should say so at the outset so that appropriate arrangements can be made.

Formal – Trust Employees

If the informal process has been exhausted and concerns remain unresolved, or if the matter is considered so serious that it cannot be discussed with any of the above through the informal process, Trust employees should contact the Director of Human Resources and Organisation Development at karen.hargan@westerntrust.hscni.net, who has responsibility for raising concerns in the public interest within the Western Trust, or the Trust's HR Employee Relations Department on (028) 71320126.

Formal – Members of the Public

If the informal process has been exhausted and concerns remain unresolved, or if the matter is considered so serious that it cannot be discussed with any of the above through the informal process, members of the public should contact the Trust's Complaints Department on (028) 71611226, or by email at complaints.department@westerntrust.hscni.net, where consideration will be given to the most appropriate avenue for the concern to be considered.

Staff and others will be expected to explain as fully as they can the information and circumstances that gave rise to their concerns. If individuals wish to submit their concerns in writing, they should set out the background and history of the concerns, giving where possible:

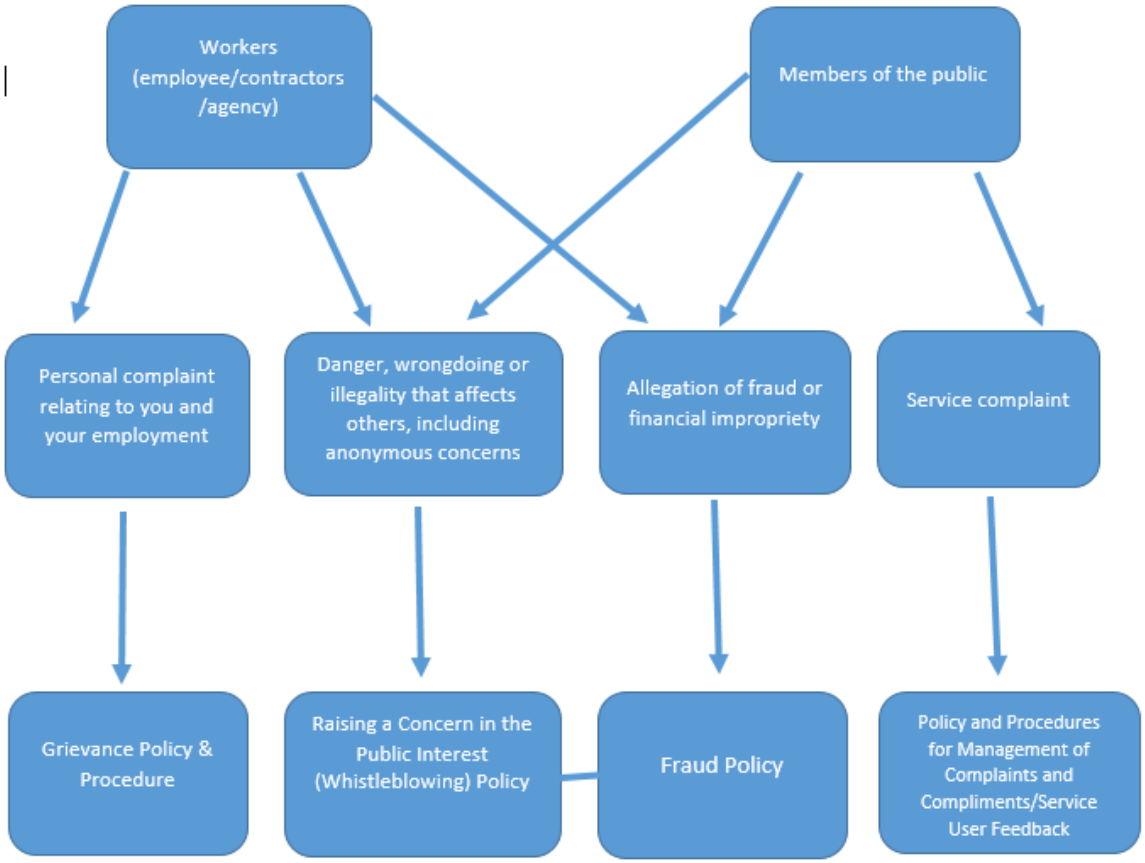
- Names, including witnesses;
- Dates the concerns arose;
- Locations, i.e. facility or ward:
- Documentary evidence if available; and
- The reason(s) why they are particularly concerned about the situation.

Screening

The Complaints Department or HR Employee Relations Department will undertake a screening process for any concerns raised formally. Staff and others should aim to ensure at the outset that concerns are directed to the appropriate avenue however, the screening process will also will determine the most appropriate process to address the concern (see figure 1 below which sets out appropriate avenues for complaints to be progressed i.e. Grievance Policy and Procedure, Raising a Concern in the Public

Interest (Whistleblowing) Policy, Fraud Policy or Complaints Procedure). The screening process may require input from a relevant Director or Clinician and will determine whether an informal or formal process is required.

Figure 1 summarises the type of issues that may be raised and the relevant policies which should apply:



Prescribed Bodies (or Media)

Staff and others can raise their concerns in the public interest formally with the prescribed external bodies listed in the link on page 13 above, or to the media. Whilst the Trust would recommend that all concerns should be raised internally in the first instance, staff and others are not required to exhaust either of the above informal/formal stages prior to deciding to go directly to any of the prescribed bodies, or media.

If a member of staff or others choose not to raise their concerns internally with the Trust, or via any of the outside organisations referred to in the legislation, it is likely they will lose their right to protection under whistleblowing legislation. The exception

to this is a case where the wrongdoing is exceptionally serious, and where staff reasonably believe that the Trust will subject them to 'detriment' or conceal/destroy evidence if they were to raise their concerns via the routes available to them.

What will the Trust do?

The Trust are committed to listening to all concerns raised by staff and others, learning lessons, and improving patient care. On receipt, the concern will be recorded and, where possible, whistleblowers will receive an acknowledgement within three working days.

A central raising concerns register, maintained securely by the HR Employee Relations Department, will include the date the concern was received, whether the whistleblower has requested confidentiality, a summary of the concerns and dates when updates and feedback have been provided. While the whistleblower's identity may be included within the allegation or report, the register will not include any information which may identify them, nor should it include any information which may identify an individual or individuals against whom an allegation is made.

Investigation

Where staff or others have been unable to resolve the concern quickly (usually 10 working days), or if the matters raised are serious in nature, the Trust will carry out a proportionate investigation, led by someone suitably independent and trained, and the Trust will reach a conclusion within a reasonable timescale. Individuals will be notified of indicative planned timescales for completion.

Wherever possible, the Trust will carry out a single investigation (so, for example, where a concern is raised about a patient safety incident, the Trust will usually undertake a single investigation e.g. a Serious Adverse Incident (SAI) investigation that looks at the concern and the wider circumstances of the incident). The investigation will be objective and evidence-based, and will conclude with a report being produced that focuses on identifying and rectifying any issues, and lessons to prevent problems recurring.

It may be more appropriate for concerns to be considered under an alternative process for example, the Complaint's Procedure, Grievance Policy & Procedure, Disciplinary

Policy and Procedure, or Conflict, Bullying and Harassment Policy and Procedure, and if this is the case the Trust will notify the whistleblower of this.

Any employment issues (that affect only a member of staff, and not others) identified during the investigation will be considered separately.

For the purposes of recording, if the concern is already, or has previously been, the subject of an investigation under another procedure, or by an outside authority, it will not be appropriate to investigate it under this policy.

Communicating with Individuals

The Trust welcomes the raising of concerns in the public interest and will treat whistleblowers with respect at all times. The Trust will discuss any concerns raised with the whistleblower to ensure an understanding of the exact concerns being shared are clearly understood. In the event that an investigation is required, the Trust will endeavour to provide a response within 12 weeks of the concern being received, will provide an update on progress by week 6, and again by week 10 of the investigation. In so far as it is appropriate, the Trust will provide feedback to the person who raised the concern.

How the Trust Will Learn From Concerns Raised

The focus of the investigation will be on improving Trust services. Where the investigation identifies that improvements can be made, the Trust will track any recommendations to ensure necessary changes are made, and are working effectively. The final outcome and 'lessons learned' will be documented in a report, and approved by the responsible Director. In addition, the relevant professional Executive Director will independently assess the findings and recommendations for assurance that the matter has been robustly considered and appropriately addressed.

Trust Board Oversight

The Trust Board and the Department of Health (DoH) will be provided with high level information about all concerns raised in the public interest by staff and others through this policy, and what the Trust is doing to address any concerns. The Trust will include similar high-level information in the annual report. Trust Board supports staff and

others raising concerns in the public interest and want staff and others to feel free to speak up. The Chair of Trust Board has nominated a non-executive director (NED) with responsibility for the oversight of the organisation's culture of raising concerns in the public interest.

The outcome of any concern raised in the public interest where malpractice or a serious safety risk was identified and addressed, will be reported to Trust Board and/or an appropriate regulator (if appropriate).

The Western Health & Social Care Trust NED responsible for Raising Concern is the Chair of Trust People Committee, Ms Ruth Laird. Ms Laird can be contacted via telephone: (028) 71611197, or via email at ruth.laird@westerntrust.hscni.net.

Review & Reporting

The Trust will provide regular reports to the People Committee on the raising concerns in the public interest caseload, and bring the Annual Report for Raising Concerns in the Public Interest to the Audit and Risk Assurance Committee (ARAC), on an annual basis. Where the concern raised relates to matters of clinical governance, reports will be made to the Trust's Patient Safety and Quality Committee. An annual return to the Department of Health will set out the agreed actions and outcomes.

This Policy has been reviewed against the NI Audit Office – Raising Concerns – A good practice guide for Northern Ireland Public Sector.

APPENDIX C:
ADVICE FOR MANAGERS RESPONDING TO A CONCERN

Managers are required to:

1. Maintain an understanding of the process for raising a concern in the public interest;

2. Notify the HR Employee Relations Department of any concerns received in relation to raising concerns in the public interest which require formal progression, in order for the concerns to be registered on the central raising concerns register, and to seek advice about how best to progress these concerns.

3. Thank the whistleblower for raising the concern, even if they may appear to be mistaken;

4. If appropriate, refer the whistleblower to other independent sources of advice and guidance on raising concerns in the public interest;

5. Respect, and treat sensitively, legitimate staff concerns about their own position or career;

6. Manage expectations and respect promises of confidentiality;

7. Discuss reasonable timeframes for feedback with the member of staff or member of the public;

8. Remember that there are different perspectives to every concern;

9. Determine whether there are grounds for concern and investigate if necessary as soon as possible. Where appropriate, alert those identified as the subject of the concern. If asked, managers should put their response in writing, confirming feedback following consideration of the concern;

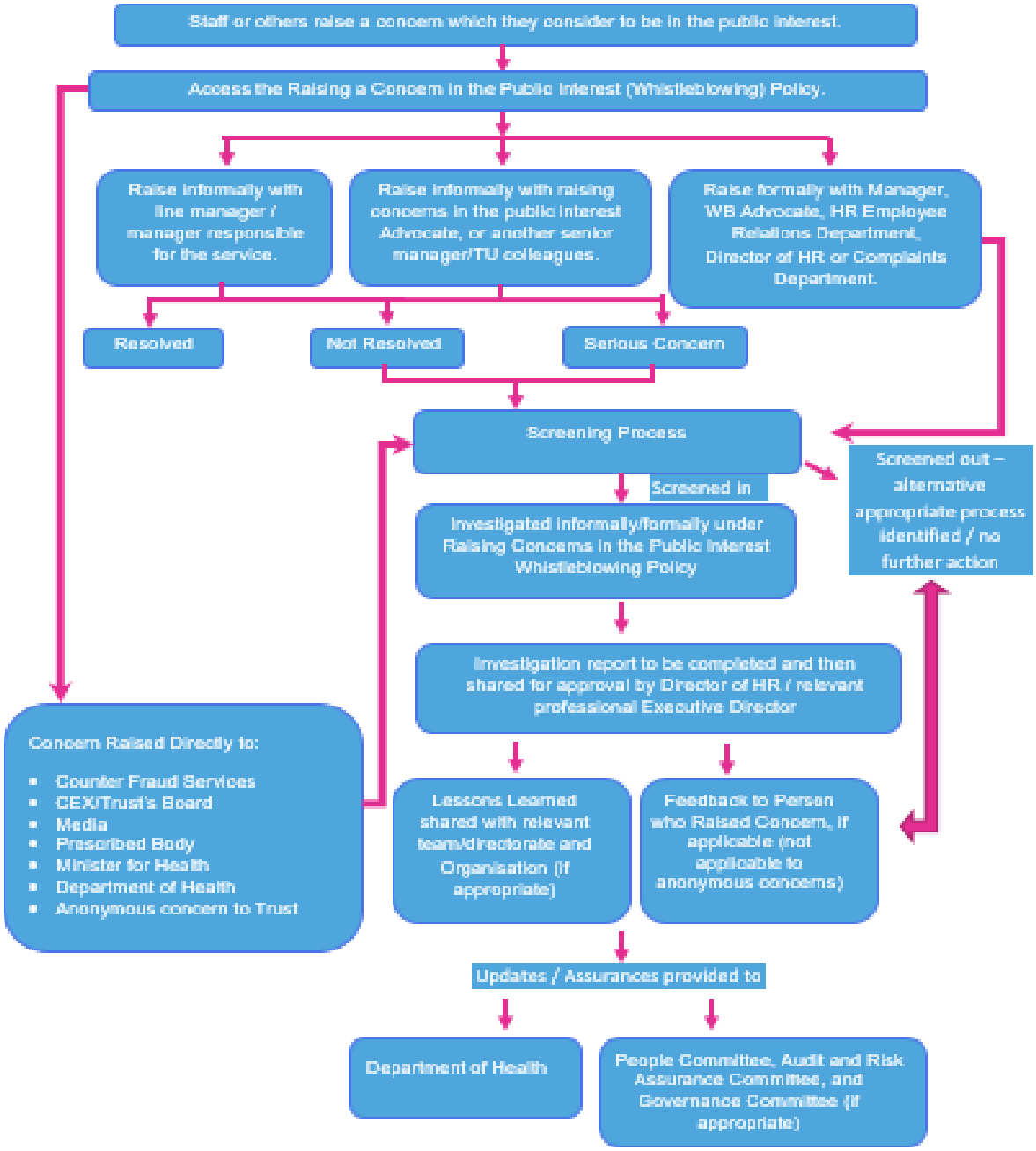
10. Ensure that the investigator is not connected to the concern raised and determine if there is any actual, potential or perceived conflict of interest which exists prior to disclosing full details of the concern. Should a conflict of interest arise at any time during the investigation, the investigator must alert the HR Employee Relations Manager as quickly as possible so that appropriate actions are agreed and taken forward.

11. Managers should bear in mind that they are accountable to provide an explanation as to how they have addressed the concern if requested;

12. Provide feedback to the individual who raised the concern, and those identified as the subject of a concern (where appropriate), any outcome and/or proposed remedial action, whilst ensuring confidentiality of all parties is maintained.

13. Record-keeping - keep a record of any concerns raised formally with those designated under the policy. These records should not identify the whistleblower or any individual whom a concern relates to. Whilst the HR Employee Relations Department will maintain a central raising concerns register, managers must record concerns raised informally and document action taken to resolve these.

APPENDIX D:
RAISING CONCERNS IN THE PUBLIC INTEREST WHISTLEBLOWING PROCESS



Western Health and Social Care Trust



Toolkit: Raising a Concern in the Public Interest

Raising a Concern in the Public Interest (Whistleblowing) Toolkit

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FREQUENTLY ASKED QUESTIONS (FAQS)

1. Who does the 'Raising a Concern in the Public Interest (Whistleblowing) Policy' apply to?

The policy applies to the following groups:

- Employees of the Trust, including permanent, temporary and bank staff;
- Students in training/placements;
- Independent contractors engaged to provide services;
- Volunteers;
- Agency workers;
- Members of the public.

The Toolkit is a guidance document for staff and others, managers and investigating officers and should be read in conjunction with the Raising a Concern in the Public Interest (Whistleblowing) Policy.

2. What is Whistleblowing?

Whistleblowing is a term which is often used to describe raising concerns in the public interest. Someone blows the whistle (Whistleblowing) when they tell the Trust about concerns relating to unlawful conduct, financial malpractice, dangers to the public or the environment, or action contrary to the public interest. These can be reported following the correct procedures as set out within the policy.

Throughout this document the phrase raising concerns in the public interest is used however it should be noted that in some other referenced material, the term whistleblowing is used.

3. Why should I blow the whistle?

Whistleblowing can inform those who need to know if a member of staff or others reasonably believe that one of the following either has occurred, is in the process of occurring, or is likely to occur:

- malpractice or ill treatment of a patient or client by a member of staff;
- where a potential criminal offence has been committed, is being committed or is likely to be committed;
- suspected theft or fraud;
- breach of Standing Financial Instructions;
- disregard for legislation, particularly in relation to Health and Safety at Work;

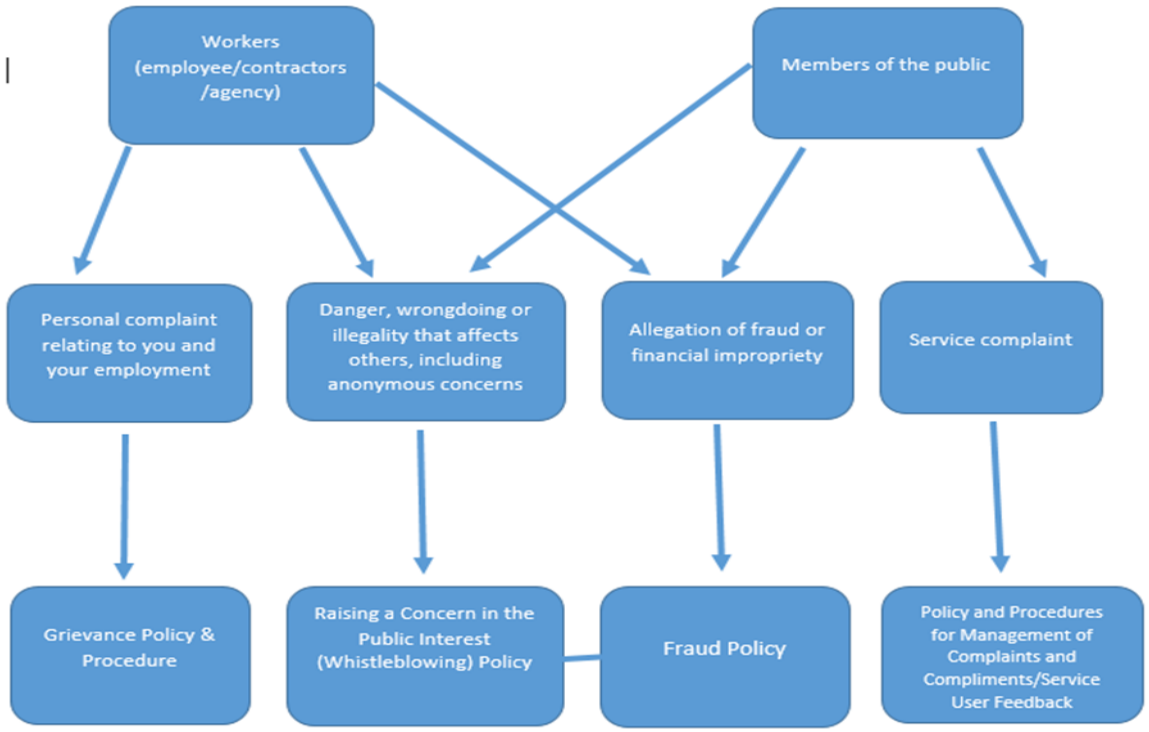
- the environment has been, or is likely to be, damaged;
- failing to declare a conflict of interest;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- showing undue favour over a contractual matter or to a job applicant;
- research misconduct; or
- information on any of the above has been, is being, or is likely to be concealed.

This list is illustrative and is not intended to be exhaustive or restrictive. It may only be through whistleblowing that this information comes to light and can be addressed before real damage is done.

4. Is Whistleblowing the same as making a complaint?

Staff and others should aim to ensure at the outset that concerns are directed to the appropriate avenue; however, the screening process will also determine the most appropriate process to address the concern (see Figure 1 below which sets out appropriate avenues for concerns to be progressed i.e. Grievance Policy and Procedure, Raising a Concern In the Public Interest (Whistleblowing) Policy, Fraud Policy or Complaints Procedure).

Figure 1 summarises the type of issues that may be raised and the relevant policies which should apply:



5. Can a concern be raised in confidence or anonymously?

The Trust hopes that staff and others will raise concerns openly in the public interest, however, the Trust recognises that there may be circumstances when staff or others would prefer to speak to someone in confidence first. If this is the case, they should indicate this when raising their concern.

Where possible, the Trust is committed to maintaining confidentiality for everyone involved in a concern. This includes the person raising the concern and the person(s) whom the concern is about. As far as possible, confidentiality will be maintained throughout the process and after the issue has been resolved.

If a whistleblower asks for their identity not to be disclosed, the Trust will not do so without their consent, unless required by law. Staff and others should however understand that there may be times when the Trust will be unable to resolve a concern without revealing their identity, for example, where their personal evidence is essential. In such cases, the Trust will discuss this with the whistleblower, and whether/how the matter can best proceed.

The Trust will consider anonymous concerns in a similar manner as those which are not anonymised. However, if the whistleblower does not disclose their identity, it will be much more difficult for the Trust to look into the matter, and it will also not be possible to protect their position or give them feedback. Further, without additional evidence, it may be difficult to investigate such complaints properly in order to establish the facts. For these reasons it is not best suited to deal with concerns raised anonymously.

6. What about using confidential information?

It is important for staff and others to be mindful of the need to avoid a breach of privacy and confidentiality of personal information. It is wrong to give details of the condition or treatment of any patient or client without their explicit consent.

7. What about bullying and harassment?

The Public Interest Disclosure (Northern Ireland) Order 1998 provides employees with protection against victimisation should they reasonably and in good faith report such concerns. The Trust will not tolerate the harassment or victimisation of anyone who raises issues under the Raising a Concern in the Public Interest (Whistleblowing) Policy; this is a serious offence and may be viewed as gross misconduct which will be dealt with under the Trust's Disciplinary Policy and Procedure and may result in dismissal.

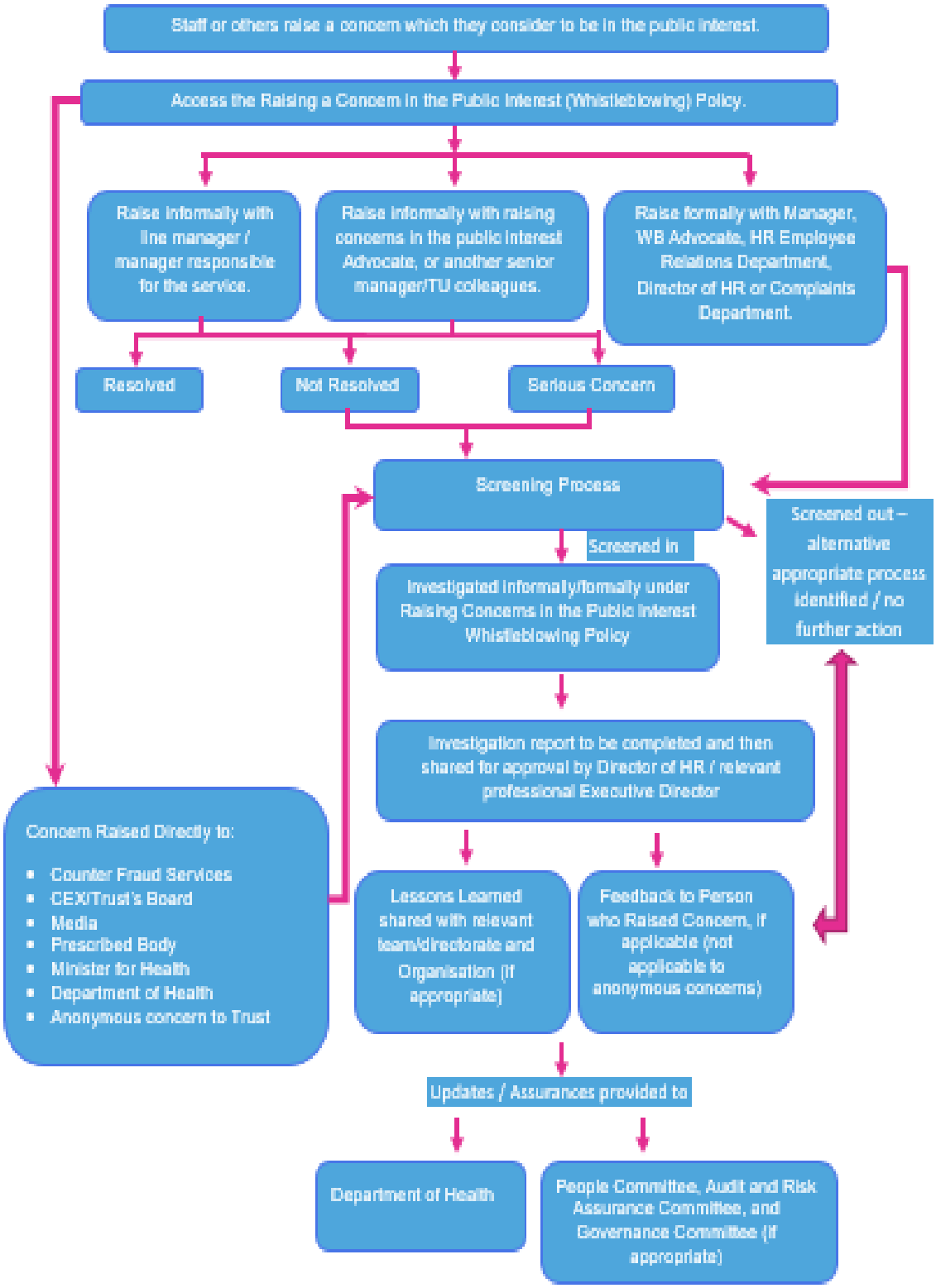
8. What happens when staff or others have concerns about someone who is employed by another organisation e.g. in a multidisciplinary team?

If staff and others have concerns about someone's practice who works for another employer, they may wish to approach the person directly on an informal basis. If this is not possible or appropriate, they should raise these concerns to their line manager or the relevant manager with responsibility for the service.

9. Does the Raising a Concern in the Public Interest (Whistleblowing) Policy apply to workers of organisations with whom the Trust contracts services?

The Trust's Raising a Concern in the Public Interest (Whistleblowing) policy applies to staff and others, including permanent, temporary and bank staff. It also applies to students in training/placements, agency workers, volunteers who are engaged in directly providing services personally to the Trust, independent contractors engaged to provide services, and members of the public.

RAISING CONCERNS IN THE PUBLIC INTEREST WHISTLEBLOWING PROCESS



USEFUL CONTACTS REGISTER

If the informal process has been exhausted and concerns remain unresolved, or if the matter is considered so serious that it cannot be discussed with any of the above through the informal process, **members of the public** should contact the Trust's Complaints Department on (028) 71611226, or by email at complaints.department@westerntrust.hscni.net, where consideration will be given to the most appropriate avenue for the concern to be considered.

If **staff** feel unable to raise the matter with the relevant manager with responsibility for the service (or lead clinician or tutor), for whatever reason, they should raise the matter with the HR Employee Relations Department, one of the Trust's whistleblowing advocates, or a more senior manager from within the Trust via the contact information below:

- HR Employee Relations Department, Tel: (028) 71320124, 71320125 or 71320126;

- Director of Human Resources and Organisation Development, Tel: (028) 7161 1189, or at karen.hargan@westerntrust.hscni.net

- Whistleblowing Advocates as detailed below:

  Please note that in some cases an Advocates' secretary may have access to their email, therefore, in order to maintain confidentiality, staff are asked not to disclose sensitive information in the email, and to seek contact from the Advocate for a more detailed discussion.

Name	Professional Group/Department	Contact Details
Kevin Leonard	Social Work	Kevin.leonard@westerntrust.hscni.net
Liabhron Ni Chaomhanaigh	AHP, Physiotherapy	Liabhron.NiChaomhanaigh@westerntrust.hscni.net
Jonathan Kennedy	Mental Health	Jonathan.Kennedy@westerntrust.hscni.net
Jennifer Farren	Performance / Business Support	Jennifer.farren@westerntrust.hscni.net
Marion Curran	Nursing (RCN)	Marion.Curran@westerntrust.hscni.net
Nancy Maxwell	Rapid Response	Nancy.maxwell@westerntrust.hscni.net
Charlene Grimes	Business Support	Charlene.grimes@westerntrust.hscni.net
Fiona McGilloway	Litigation	Fiona.mcgilloway@westerntrust.hscni.net
Kate Duffy / Anne McGroddy	Finance	kate.duffy@westerntrust.hscni.net/ Anne.mcgroddy@westerntrust.hscni.net
Laura Kyle	Nursing	Laura.kyle@westerntrust.hscni.net

Other key contacts may include:

Position	Contact
Chief Executive	Karen.hargan@westerntrust.hscni.net
Medical Director	Brendan.Lavery@westerntrust.hscni.net
Executive Director of Finance, Contracts & Capital Development	Eimear.McCauley@westerntrust.hscni.net
Director of HR & Organisation Development (Responsible Officer for Whistleblowing)	(interim arrangements)
Director of Surgery, Paediatrics & Women's Health	Mark.Gillespie@westerntrust.hscni.net
Director of Unscheduled Care, Medicine, Cancer & Clinical Services	Geraldine.Mckay@westerntrust.hscni.net
Director of Children & Families	(interim arrangements)
Director of Nursing, Midwifery & AHP's	Donna.Keenan@westerntrust.hscni.net
Director of Adult Mental Health and Disability Services	Karen.Obrien@westerntrust.hscni.net
Director of Planning, Performance & Corporate Services	Teresa.Molloy@westerntrust.hscni.net
Director of Community and Older Peoples Services	Maura.ONeill@westerntrust.hscni.net

Whilst the Trust would recommend all concerns of this nature should be raised internally in the first instance, staff and others can raise a concern in the public interest with an outside body as specified in The Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014, which can be viewed at https://www.legislation.gov.uk/nisr/2014/48/schedule/made for a full list of contacts.

Independent advice is available through the independent charity PROTECT, who can be contacted on (020) 3117 2520 or via here.

Suspicions of fraud or bribery should initially be raised with the relevant manager with responsibility for the service, but where staff and others do not feel this is appropriate, the following officers may be contacted:

- Fraud Liaison Officer directly
- Director/Assistant Director
- Director of Finance
- Head of Internal Audit
- The confidential HSC Fraud Hotline 0800 096 33 96
- Online report https://cfps.hscni.net/report

The Fraud Liaison Officer should be contacted in all instances.

Staff and others can also contact the regional HSC Fraud Reporting Hotline on telephone on 0800 096 33 96, or report their suspicions online via https://cfps.hscni.net/report These avenues are managed by BSO Counter fraud and Probity Services (CFPS) on behalf of the HSC and reports can be made on a confidential basis.

TOP TIPS FOR STAFF AND OTHERS

Whistleblowing is when you speak out about something you are concerned about because you think it needs brought to the attention of the Trust in the interest of the public. The Trust recognises this can be a difficult decision to make and therefore the following are some tips to help you make your decision in an informed way, and to help you access any support you may need:

- **Read the Raising a Concern in the Public Interest (Whistleblowing) Policy.**

Available on the Western Trust website or by contacting the HR Employee Relations Department (028) 71320124, 71320125 or 71320126.

- **Raise the concern immediately or at the earliest opportunity.**

If you believe that something is wrong, you do not need proof. Speaking out early could stop the issue from becoming more serious, dangerous or damaging.

- **Think about whether your concern can be discussed in an informal way.**

Ideally all staff and others should feel they are able to raise concerns informally. For members of staff this could involve a discussion during the supervision meeting, at appraisal, team or departmental meetings or at staff forums.

- **Report your concerns.**

The line manager (for staff) or relevant manager with responsibility for the service is usually the first person to go to. If you believe that the manager may be involved, or you feel unable to raise it with them, you may need to go to another manager or someone else that is listed in the useful contacts within this toolkit.

Concerns should be raised internally in the first instance. However, if you do not wish to raise your concern internally then you may consider informing an appropriate external organisation. A link of the full list of prescribed bodies is included on page 13 within the policy.

Reporting anything to the media should always be a last resort, particularly if what you want to report involves private or confidential information.

- **Provide factual Information**

When you report your concern, focus on as much factual information/evidence as possible. This means being specific about dates and times, what happened and the order of events, who was involved and any witnesses.

Provide as much supporting information as you can but **always** ask for further advice if you intend to provide documents which contain private or confidential information.

- **Act honestly and professionally at all times in the interests of patients, clients and service users.**

Try to present the situation clearly and identify what you believe to be the key issues and risks. For example, is there a risk to the patient/client/service user or is it to do with a professional/clinical practice etc. Writing it down will help you to get your thoughts in order, particularly if you are upset, worried or feeling emotional about it. You can use the observation sheet within this toolkit to focus on the main issues.

- **Check out the process and what will happen next.**

Discuss the way forward with your line manager (for staff), the relevant manager with responsibility for the service, or the person nominated to investigate your concerns. You will need to give them a reasonable amount of time to check the facts, and to find out more if they need to, before they feed back to you. Respect the fact that the manager may need to keep some information private and confidential if it relates to other people.

Try to cooperate with any investigation into what you have reported and the attempts to resolve the issues and put things right. Members of staff are entitled to get support from a work colleague or trade union representative at any meeting to discuss their concerns, or during any investigation that takes place. Members of the public can request the support from any of the whistleblowing advocated listed within this toolkit.

- **Keep track of what is happening.**

Even if you raise your concern verbally, you should also keep a record in writing of any discussions relating to your concern – this means things like the dates things happened, who you talked to, what was said, what the response was.

One way of keeping track of things is to email the manager/nominated person after any discussion with a summary of the main points. Make it clear that you are raising a concern in line with the Trust's Raising a Concern in the Public Interest Whistleblowing Policy and the Public Interest Disclosure Act 1998 (PIDA). This is the law relevant to whistleblowing.

- **Maintain confidentiality.**

It is best if you can speak out openly about what you think, although you can ask for your identity to be kept confidential. The person/manager with whom you talk about things should make every effort to protect your identity. However, there may be times when, because of the nature of the investigation or what you want to say, it will be necessary to reveal your identity. If this is going to happen then the person you raise your concerns with will make every effort to let you know first.

Concerns which are raised anonymously – this means when you do not reveal your name - can be more difficult to deal with and fully investigate. A more robust response is likely and possible if your identity is known when you report something.

❖ Advice and support

It is important to access appropriate support at an early stage. Staff can seek advice and support on the whistleblowing process from the HR Employee Relations Department (028) 71320124, 71320125 or 71320126 and members of the public can seek advice from the Trust Complaints Department on (028) 71611226.

Employees of the Trust can also avail of local support in the workplace, and representation at formal meetings from their Trade Union, professional body or work colleagues. Emotional and/or therapeutic support is also available for Trust employees from Inspire Workplaces, which is a free and confidential support line offered to all employees of the Trust on 0808 800 0002. Furthermore, if you are an employee of the Trust and feel you require additional support you can contact the Trust's Occupational Health Department (028) 71611407.

SELF- ASSESSMENT CHECK OUT SHEET

The following list is aimed at supporting staff and others to fully consider their concern and decide on next steps:

CAREFULLY assess the situation and think about what you have seen or heard. How do you feel, what is your instinct telling you? Completing the observation sheet will help you with this.

HAVE you considered all possibilities – perhaps things are not as they first appeared.

EXPLORE your options. What action is most appropriate? Is it feasible to challenge right away whilst the act is taking place? Or do you need to speak to your line manager or relevant manager with responsibility for the service, or another senior manager or implement the Raising a Concern in the Public Interest Whistleblowing Policy?

CAN it wait or do you need to do something straight away? If the person is in immediate danger (physical or mental) then you need to act immediately. Tell your line manager or relevant manager with responsibility for the service or another senior manager.

KEEP the person at the centre – do not lose sight of their needs and feelings.

OWN IT - once you have decided something needs to be done do it, do not leave it to someone else.

TAKE ACTION – there are various ways to do this:

- challenge whoever is behaving inappropriately at the time they are doing it
- talk to your line manager or the relevant manager with responsibility for the service or another contact within the useful contact register in this toolkit about what you have seen and how you have felt

OBSERVATION SHEET

When you think you have witnessed poor practice, this observation sheet may help you clarify the details of what you have seen or heard. This sheet should only be used when you believe you have witnessed poor practice. If you think someone is in immediate danger because of *abuse* or *neglect* you must report it immediately.

Once you become sure that poor practice has taken place, you need to take action. This may involve challenging the person who you have seen perform the action, or reporting it to your line manager or the relevant manager with responsibility for the service.

What have you seen or heard?
When did it happen?
What was the impact on the person being cared for?
Did you feel they were in danger of being harmed, and if so, why?
Is there anyone you can check it out with? Yes No
If yes, what is their response?

CHALLENGING POOR PRACTICE

Sometimes when we encounter poor practice it may be more appropriate to point out the poor practice there and then in a way that is not confrontational. For the majority of people who may have been thoughtless, but not intentionally negligent, this type of interaction should be enough to get them to realise the inappropriateness of their action and change their behaviour. When challenging poor practice, staff and others should:

- Have confidence.
- Remain respectful and do not patronise the individual you are challenging.
- Tailor your approach based on the situation and how well you know the person
- Use your own personal style.

Some examples of how to challenge poor practice may include:

- *Ooh (staff name), I think you've forgotten to **** – I forgot yesterday and felt bad when I realised, because I know just how important it is to (Patient Name).*

- *I'm sorry, I'm probably not with it today, but can you talk me through why you've just done ....*

Challenging Harmful Practice

If you observe something harmful, for example a poor lifting and handling technique, it's necessary to use stronger words to let the person involved know how concerned you are or stop the action continuing. Things to say might include:

- *I feel very uncomfortable about ....*

- *I am concerned that ....*

- *Please Stop. You're causing distress.*

However if you see something that is very clearly abuse report it immediately.

GOOD PRACTICE GUIDE FOR MANAGERS



It is important that all Trust managers work towards creating a culture of openness and transparency, where employees and others feel safe and are encouraged to speak up.

❖ Consider your management style

It's important that you are approachable, and foster a climate of openness and mutual respect. Encourage employees to check if they are unsure what is appropriate and to admit errors rather than concealing them, so that they can be remedied.

❖ Be prepared

Familiarise yourself with the Trust's 'Raising a Concern in the Public Interest (Whistleblowing) Policy' to understand your role and responsibilities as a manager and how to respond to and handle concerns raised. Attend any training provided, or request training when needed.

❖ Seek advice

Know how and where to escalate serious concerns which need to be dealt with by senior staff, and explain this to staff and others raising the concern.

❖ Put values into practice

Ensure employees understand the values of openness and transparency. Inform staff about their personal responsibility for respectful treatment of staff and others who raise concerns for the public good.

❖ Offer support and encourage early action

Support and encourage staff and others to raise concerns at the earliest opportunity. Concerns at work could be a regular agenda item for discussion in normal communication and regular meetings, such as 1:1 meetings, team meetings and departmental meetings.

❖ Find a solution

Focus on constructive discussion and dialogue, finding a solution, making improvements and dealing with risk. Identify any training or development needs for workers to support competency in the role.

GOOD PRACTICE GUIDE FOR MANAGERS

WHAT TO DO WHEN STAFF OR OTHERS REPORT A CONCERN

