



Whistleblowing Policy

National Back Exchange

Responsible Person

Sarah Thornton, Chair

Authors

Kerry Kemp, Vice Chair

Mary Muir, Publications Director

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1. Version Control Summary

Date	Version no.	Summary of changes	Consulting group/person
2007	1.0	New policy	NBE Executive
2010	1.1	Policy review	NBE Executive
July 2018	1.2	Minor format and content changes	NBE Executive Vice Chair
March 2020	1.3	Minor content change to signpost to Trustees information	NBE Executive Vice Chair
October 2020	1.4	Removal of NBE address	NBE Executive Vice Chair
April 2025	2.0	Reviewed and updated previous whistleblowing policy to support NBE as a Charitable Incorporated Organisation, which came into force 29th March 2023.	S Thornton, Chair K Kemp, Vice Chair M Muir, Publications Director

2. Introduction

At National Back Exchange (NBE) we are committed to maintaining the highest standards of integrity and accountability in all our operations. As a charitable organisation, we recognise the importance of transparency and ethical conduct to foster within the NBE community.

Our Whistleblowing Policy ensures a safe, confidential way for individuals to report any malpractice or unethical behaviour. We encourage early reporting to address issues promptly and effectively, creating an environment free from fear of reprisal.

This policy outlines procedures for reporting, investigating, and resolving concerns in line with the sentiment of the Public Interest Disclosure Act 2014. By adhering to this policy, we aim to maintain ethical practices and safeguard our mission.

We view this policy as a constructive process to resolve issues swiftly and non-adversarial, contributing positively to our continuous improvement.

3. Purpose and Scope

This policy outlines how NBE members or other parties can express concerns about malpractice, wrongdoing, or unethical behaviour early and appropriately, in line with the sentiment of the Public Interest Disclosure Act 2014.

NBE members or other parties have the right and duty to report concerns to the NBE Board of Trustees. This policy ensures that all concerns are taken seriously and encourages NBE members or other parties to use the appropriate channels for communication.

4. Policy Scope

This policy aims to:

- **Encourage Confidence:** Empower NBE members and other parties to confidently raise serious concerns and act upon them.
- **Provide Confidential Pathways:** Offer secure channels for raising concerns and receiving feedback on actions taken.
- **Ensure Responses:** Guarantee responses to raised concerns and provide guidance on further steps if the outcome is unsatisfactory.
- **Protect Whistleblowers:** Assure protection from reprisals or victimisation, even if the disclosure is made in good faith but turns out to be mistaken.

Existing procedures allow NBE members and other parties to lodge complaints or grievances as detailed in NBE published policies. It is also important to consider the guidance and professional advice from relevant professional and regulatory bodies.

This policy addresses serious public interest concerns that are not covered by other NBE policies or procedures. These concerns may be currently occurring, have occurred in the past, or are likely to occur in the future, including:

- A criminal offence
- The breach of a legal obligation
- Financial irregularities such as fraud or corruption
- A miscarriage of justice
- A danger to the health and safety of an individual
- Discrimination
- Damage to the environment
- Deliberate falsification of information

- Deliberate failure to disclose/report information which will have an adverse effect on NBE or individual NBE members or other parties

Concerns about any aspect of service provision or conduct should be reported under this policy. Relevant situations that may include:

- Conflicts with NBE's policies and procedures
- Falling below recognised professional code of conduct standards
- Involvement in improper conduct

Actions taken under this policy may lead to other procedures, such as disciplinary actions and formal investigations.

5. Definitions

	Complaint	Grievance	Whistleblowing
Definition	A complaint is an expression of dissatisfaction regarding the service, actions, or lack of actions of the NBE Board of Trustees, NBE members, the Association's Administration Team, or associated personnel, where an individual perceives any act, treatment, behaviour, or condition as unfair or unjust	A grievance refers to the legitimate complaint made by NBE Board of Trustees, NBE members, Associations Administration Team regarding unfair or unjust treatment	Whistleblowing is the act of reporting serious concerns about wrongdoing, misconduct or unethical behaviour within the NBE organisation, typically where the issue may impact others or the public interest.
Who can file?	Complainant	Aggrieved	Any individuals with reasonable belief of wrongdoing including NBE members or other parties.
What is it	An oral or written claim by an individual	Written complaint	An oral or written claim by an individual
Nature	Informal	Formal	Formal
Issue	Minor or Major	Major	Minor major
Please note: Complaints and grievance concerns will be addressed using the relevant published policy.			

6. Responsibilities

The Chair or designated representative will be responsible for the implementation of this policy within NBE, ensuring that all concerns raised are dealt with fairly, thoroughly, and in accordance with the policy. The Board of Trustees members are responsible for ensuring that NBE members or other parties are aware of the policy and its application, and for creating an environment in individuals can express concerns freely and without fear of reprisal.

7. Reporting Procedure

If members or other parties raise a concern, NBE will investigate to determine the appropriate action, which may include a formal investigation. All parties will be informed about who is managing their concern, how to contact them, and if further internal assistance is needed. Those who raise a concern will be kept updated on the investigation's progress and will receive a written response detailing the outcome.

A whistleblowing concern may be raised verbally or in writing. If raised verbally, non-verbatim notes of the conversation will be retained. However, the individual may be asked to put their concerns in writing to create a formal record and avoid any misunderstanding of the concern raised. The concern should contain as much information as possible and will be processed in accordance with the NBE Data Protection Compliance policy.

8. Audit – Monitoring Process

Monitoring process	Requirements
Who	<ul style="list-style-type: none"> National Back Exchange Board of Trustees
How	<ul style="list-style-type: none"> The Board of Trustees will review the policy annually. An early reviewed may be warranted if one or more of the following occurs: <ul style="list-style-type: none"> As a result of regulatory / statutory changes or developments As a result of NBE policy changes or developments
Presented to	<ul style="list-style-type: none"> Board of Trustees
Monitored by	<ul style="list-style-type: none"> Procedural document review group <ul style="list-style-type: none"> Sarah Thornton, Chair Kerry Kemp, Vice Chair Mary Muir, Publications Director National Back Exchange Board of Trustees
Completion / Exception report to	<ul style="list-style-type: none"> Extraordinary circumstances beyond the control of National Back Exchange.