

Local Friends Policies

Disclosure of Malpractice

Policy Statement

It is vital that everyone who works for us acts within the law and maintains the highest standards of conduct. If anyone has genuine concerns about malpractice, we want to hear about them. We undertake to do everything we can to protect the person raising such concerns from any negative consequences.

Malpractice includes, but is not limited to, issues such as:

- financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion;
- failure to comply with legal obligations;
- sexual misconduct, including sexual abuse, harassment or exploitation;
- abuse or exploitation of children, vulnerable adults or beneficiaries;
- breach of *Local Friends* policy;
- abuse of position;
- danger to the health and safety of individuals;
- damage to the environment;
- improper or unethical behaviour;
- activity which would bring *Local Friends* into serious disrepute; and
- the deliberate concealment of information relating to any of the matters listed above.

Scope

This policy applies if you believe that malpractice has taken place, or if you have reason to believe that there is a significant risk of malpractice taking place.

This policy applies if you have a genuine concern and have a reasonable belief it is in the public interest, even if it is later discovered that you are mistaken.

This policy does not apply if you maliciously raise a matter you know to be untrue or which you are responsible for. Action will be taken against anyone found to be maliciously making allegations concerning malpractice.

Disclosure

If you wish to disclose malpractice, please follow the procedure below.

First, identify the appropriate person to raise the matter with. This must be someone you do not suspect of being involved in the malpractice. It should be, if

possible, the person you report to; if not them, then the person they report to, and so on. If you cannot raise the matter with any of these people in Local Friends, then it should be the Enabler of Mission and Unity at Churches Together in Greater Bristol.

Second, write down the details of your concern and give them to the person you identified. Whenever possible, answer the following questions.

- What are you concerned about?
- Is anyone at immediate risk of harm? If so, who?
- What are the details? Where possible, identify dates, times, places and people.
- Who is involved, and in what way?
- How do you know about it?
- When were you first concerned about it?
- Have you told anybody about it? If so, was any action taken?
- If you have been warned against disclosing the malpractice or threatened with negative consequences if you make a disclosure, then these details must also be included.

Third, if you believe that you have been victimised or threatened as a consequence of making the disclosure, then this must also be disclosed as soon as possible, and will form part of the investigation.

Response

Upon receiving a disclosure of malpractice, undertake the following actions.

- Acknowledge receipt of the disclosure and your intention to deal with it as a high priority.
- Identify who should be notified of the disclosure. In particular, do you need to notify the Police?
- If it is not a matter for the Police, identify who should be involved in investigating the disclosure. In particular, identify whether it should be an internal investigation or handed over to people outside *Local Friends*.
- Undertake or cooperate with the investigation to the best of your ability.
- If the person who made the disclosure reports that they have been victimised or threatened as a consequence of making the disclosure, then take steps to reassure them and protect them, and then include this new information in the investigation.
- If the investigation takes some time, keep the person who made the disclosure informed that the investigation is still in progress. If you can, communicate some details about the progress; otherwise, apologise for not being able to say anything more at this stage.
- When the investigation is complete, give the person who made the disclosure as full a report of the outcome as possible, bearing in mind that there may be confidential details which you cannot disclose.

Anonymous Disclosure

You are strongly encouraged not to make anonymous disclosures as details and further concerns cannot then be checked with you and this may seriously limit the ability of investigators to pursue your concerns. All disclosures, made anonymously or otherwise, will be investigated, but lack of information may limit the nature, extent and outcome of the investigation.

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