



RAISING CONCERNS POLICY

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1. INTRODUCTION

- 1.1 As a responsible public sector organisation, NILGOSC is committed to the highest possible standards of transparency, probity, and accountability in the conduct of its business. Whilst a wide range of policies, procedures and codes of practice have been put in place to ensure NILGOSC business is conducted in line with these standards, malpractice, risk, abuse, unlawful conduct and/or wrongdoing may unfortunately still occur.
- 1.2 In order to identify and address any such potential issues before damage is done to the organisation, its staff or stakeholders, NILGOSC is committed to having a supportive culture that encourages concerns to be raised and recognises that raising concerns is essential to safeguard the integrity of the organisation; safeguard staff and the wider public and prevent damage.
- 1.3 The purpose of this policy is to enable concerns to be raised in the right way, without fear of victimisation or, in the case of staff and Committee Members, without putting their jobs or positions at risk or disadvantage. The policy sets out what type of concerns can be raised in line with this policy, how to raise a concern, what to expect when you raise a concern and possible legal protections available for staff.
- 1.4 This policy has been developed in line with Northern Ireland Audit Office guidance including "Raising Concerns – A good practice guide for the Northern Ireland Public Sector - June 2020", the 2016 HM Treasury "Audit Risk and Assurance Committee Handbook" and the Department for Communities (DfC) Notes to ALBs- Raising a Concern (Whistleblowing) Policies- March 2023.
- 1.5 NILGOSC will take each concern seriously and regards concerns as an opportunity to learn and put things right.

2. WHAT IS A 'CONCERN'?

- 2.1 Raising a concern in the public interest (sometimes referred to as 'whistleblowing') is the action of telling someone in authority, either internally and/or externally about wrongdoing, risk, or malpractice. Concerns raised can provide NILGOSC with an important source of information that may highlight serious risks, potential fraud, or corruption.
- 2.2 The nature of the issue being raised will determine whether it is a concern (whistleblowing), a grievance or a complaint, and therefore the appropriate policy under which it should be addressed.
- 2.3 When someone raises a concern, it is about danger, illegality, wrongdoing or malpractice that affects others. The person raising the concern is usually not personally or directly affected – they are simply trying to alert others who can address the issue. For this reason, they should not be expected to prove the concern and such concerns should be handled in line with this policy by the appropriate person.
- 2.4 When a worker raises a grievance, they believe they have personally been treated poorly. This may involve a breach of their employment rights or bullying and the person is seeking redress of justice for themselves. Therefore, they have a vested interest in the outcome. Such issues should be handled in line with the Grievance Policy.
- 2.5 A member, pensioner or other service user may complain about the service provided to them by NILGOSC. They (or someone they are acting on behalf of) will have been personally affected by the poor service and will be seeking some form of redress or compensation. Such issues should be handled in line with NILGOSC's Complaints Policy.
- 2.6 The procedures set out in this policy are in addition to the NILGOSC Anti-Fraud Policy, Anti-Bribery Policy and the Fraud and Corruption Response Plan. If a concern relates to an incidence of suspected or actual fraud or bribery, the procedures set out in the Fraud and Corruption Response Plan should be followed in relation to internal notification and reporting of such instances.
- 2.7 Appendix 1 summarises the types of issues that may be raised and the relevant policies that should apply. There might be instances where a person raises an issue which has elements both of a wider concern affecting others and of personal interest. In such cases, NILGOSC will need to separate the issues and deal with each in accordance with the relevant policy.
- 2.8 Where an individual believes that a crime has been committed, it should be reported to the PSNI without delay and will be reported internally as per section 7.8 of the Fraud and Corruption Response Plan.

3. WHO CAN RAISE A CONCERN?

- 3.1 A concern can be raised by anyone, internal or external to the organisation. Generally, when a concern is raised internally, it will be raised by a member of staff (worker). Legislation defines the term 'worker' to include employees, contractors, trainees, agency staff and home-workers.
- 3.2 Workers are considered to be the 'eyes and ears' of an organisation and are often best placed to identify potential deficiencies and problems at an early stage before damage is done. Therefore, workers who are prepared to raise concerns about such issues are recognised as an important source of information for NILGOSC and are encouraged to speak up about their concerns.
- 3.3 When such a concern does come to light it can be difficult for workers to know what to do. They may be concerned about raising a concern and may feel they are being disloyal to a colleague, manager or to NILGOSC or may fear they are putting their job at risk. This will not be the case – all workers should feel they are able to raise a concern without fear of victimisation, bullying or harassment. All concerns raised will be taken seriously and the matter will be handed fairly and properly in line with this policy. Further protection for workers is also provided by public interest disclosure legislation (refer to section 5).
- 3.4 A member of the public can also raise concerns directly with NILGOSC. Appendix 1 demonstrates that the nature of the issue raised will determine which policy under which the matter will be considered. A member of the public can raise the same types of concerns as a worker. Such concerns must be treated seriously and should be dealt with in the same way as concerns raised by workers. It is the issue being raised that is important, not the person raising it.

4. LEGAL PROTECTION

- 4.1 The Public Interest Disclosure (NI) Order 1998 came into operation on 31 October 1999 and is designed to encourage 'workers'¹ to raise concerns (referred to in the legislation as 'making a disclosure in the public interest') on criminal behaviour or wrongdoing, as defined in the legislation. These disclosures are also known as 'protected disclosures.' This Order protects a worker making responsible disclosures from dismissal, victimisation or any other unfavourable treatment connected with raising a concern. The Order only protects workers who follow the procedures laid down in legislation (i.e. by following this policy) and who raise concerns in the public interest to an appropriate person which, in the reasonable belief of the individual, tends to show one or more of the following:
- A criminal act (e.g. theft) or a breach of civil law (e.g. slander or libel)
 - A breach of any legal obligation
 - A miscarriage of justice
 - Health and safety risks, including risks to the public as well as other employees (e.g. faulty electrical equipment)
 - Damage to the environment
 - Deliberate covering up of information tending to show any of the above
- 4.2 This Order was introduced to provide retrospective protection to workers who raise a concern in their workplace and suffer detriment in any way as a result. Detriment may include bullying, marginalisation or being treated unfairly or unfavourably. This legal protection is not available to members of the public raising a concern, as there is no employment relationship with NILGOSC.
- 4.3 Protection is provided to anyone raising a concern by proactively adopting good practice so that concerns are properly and appropriately dealt with, ensuring detriment does not occur and recourse to a tribunal is not required.

¹ Article 3 (3) of the Employment Rights (NI) Order 1996, defines a "worker" as an individual who has entered into or works under (or, where the employment has ceased, worked under)–
(a) a contract of employment, or
(b) any other contract, whether express or implied and (if it is express) whether oral or in writing, whereby the individual undertakes to do or perform personally any work or services for another party to the contract whose status is not by virtue of the contract that of a client or customer of any profession or business undertaking carried on by the individual

5. PROTECTION FOR WORKERS

- 5.1 NILGOSC workers are protected by the Order if they **genuinely believe** that misconduct or malpractice was or is being committed and they are not making the disclosure for personal gain or with malicious intent. Staff raising a **genuine concern** under this policy, will not be at risk of losing their job/position or suffering any detriment as a result and will be protected even if the matter is found to be mistaken provided they:
- Believe on reasonable grounds that the information is accurate
 - Have not made the allegation principally for the purpose of obtaining payment or personal gain
 - Have taken reasonable steps to raise the matter internally by drawing it to the attention of the appropriate individual (in line with this policy)
- 5.2 NILGOSC is committed to addressing concerns raised in the public interest and encourages the submission of all genuine concerns. NILGOSC will adopt a zero tolerance approach to the harassment, victimisation, or any other unfavourable treatment of anyone who raises a genuine concern and would hope that staff feel assured they can openly raise any concern. Victimisation of an individual raising a concern will be treated as a serious disciplinary offence. This will be monitored, and any evidence or complaints of victimisation will be investigated, and appropriate action taken, which may include dismissal.
- 5.3 The legislative framework makes it unlawful for an employer to subject a worker to detriment on account of the fact that they have made a qualifying disclosure i.e. a disclosure which qualifies for protection under legislation (Protected Disclosures). Where detriment occurs as a result of a qualifying disclosure being made, the Employment Rights (Northern Ireland) Order 1996 provides a right for a worker to bring a claim to an Employment Tribunal. In effect the legislation therefore provides a remedy as opposed to protection.²
- 5.4 Even if an individual is a worker the disclosure may not meet all of the requirements of the legislation and may not be protected. Ultimately only a court (Tribunal) can determine this.
- 5.5 If a worker destroys or conceals evidence of poor or unacceptable practice or misconduct this will be treated as a serious disciplinary offence and appropriate action will be taken, which may include dismissal.
- 5.6 If, subsequent to an investigation, it is considered that an allegation was made under this policy for personal gain or with malicious intent and has no foundation, NILGOSC will regard such allegations as a serious disciplinary offence and will take appropriate action, which may include dismissal.
- 5.7 In order to avail of the protection offered by the Order the concern raised must meet the conditions set out at 4.1 above and it must be raised in line with the procedures set out at section 9. A concern raised outside the procedures set out in this policy will only be protected in certain circumstances and prior to taking this course of action it is strongly recommended that you seek advice (see section 13 for details of independent sources of advice).
- 5.8 If it becomes clear that the worker raising the concern has committed an illegal act in the course of making the disclosure (e.g if disclosure was prohibited under the Data Protection Act 2018) then they may not be protected and disciplinary action may be taken.
- 5.9 If a worker who raises a concern believes they are suffering detriment as a direct result, they should refer to NILGOSC's Grievance Policy.

6. WHAT TYPES OF CONCERN CAN BE RAISED?

6.1 Concerns can be raised about any issue relating to suspected malpractice, risk, abuse, or wrongdoing that is in the public interest. The types of issues about which you can raise concerns include:

- Conduct which is a criminal offence (e.g. theft)
- Health and safety risks to employees, service users or the public
- Maladministration (e.g. unjustified delay, incompetence, negligent advice)
- Failure to safeguard personal and/or special category information and/or the subsequent misuse of such information (data protection)
- Abuse of vulnerable adults (e.g. through physical, sexual, psychological, or financial abuse, exploitation, or neglect)
- Damage to the environment (e.g. pollution)
- The unauthorised use of public funds
- Fraud and corruption
- Breach of the Staff or Committee Member Code of Conduct
- Abuse of power
- Other unethical conduct
- Any deliberate concealment of information tending to show any of the above

6.2 This is not an exhaustive list but is intended to illustrate the sort of issues that may be raised under this policy.

6.3 The individual raising the concern does not need evidence or proof of wrongdoing, just an honest belief that there is a basis for concern. It is best to raise the concern as early as possible, even if it is only a suspicion, to allow the matter to be investigated properly.

7. HOW TO RAISE A CONCERN – OPENLY, CONFIDENTIALLY, ANONYMOUSLY?

7.1 A concern can be raised openly, confidentially, or anonymously. Raising a concern openly means the individual is happy to be identified as the person who raised the concern. Openness makes it easier for NILGOSC to investigate and obtain more information about the concern. Openness also encourages others to come forward as they will know that a concern has been raised.

7.2 Raising a concern in confidence means the individual raising the concern is content to provide their name and contact details but wants to protect their identity as far as possible. However, it is not always possible to maintain confidentiality if this impedes the investigation. In such cases, NILGOSC will seek to maintain the confidentiality of the individual to the maximum extent possible. Where this is not possible, NILGOSC will seek to obtain informed consent from the individual prior to any action being taken that could identify the individual.

- 7.3 Raising a concern anonymously means you choose not to reveal your personal details, such as name and contact information. NILGOSC will accept anonymous concerns and commit to giving them due consideration but there are disadvantages to raising concerns anonymously:
- Detailed investigations may be more difficult, or even impossible, to progress if the individual raising the concerns chooses to remain anonymous and cannot be contacted for further information
 - The information and documentation provided in support of the concern raised may not be easily understood and may need further clarification or explanation
 - There is a chance that the documents provided might reveal the identity of the individual raising the concern
 - It may not be possible to remain anonymous throughout an in-depth investigation
 - NILGOSC will be less able to give feedback on the outcomes of any action taken.
 - It may be difficult to demonstrate to a tribunal any detriment suffered to the individual as a result of raising a concern anonymously
- 7.4 NILGOSC will still investigate anonymous reports and in doing so will take into account factors, such as the seriousness of the issues raised, the credibility of the concern and the likelihood of confirming the allegation from attributable sources. However, NILGOSC encourages individuals raising a concern to do so openly or confidentially.
- 7.5 NILGOSC will treat all disclosures made through this policy in a confidential and sensitive manner. The identity of the individual making the allegation will be kept confidential to the maximum extent possible if requested and will only be disclosed with their consent or on direction of a Court or other regulatory body. If this occurs, NILGOSC will discuss with the individual how to proceed.

8. RAISING A CONCERN INTERNALLY

- 8.1 Anyone who is considering raising a concern should know that they do not need to have firm evidence of malpractice, only a reasonable suspicion that something may be wrong. The person raising the concern is a witness to potential wrongdoing and is merely relaying the information. It is NILGOSC's responsibility to use the information provided to investigate the issue raised. However, the individual raising the concern will be asked to explain, as fully as possible, the information or circumstances that have given rise to their concern.
- 8.2 Disclosures can be made verbally or in the form of a written report of the known facts. In both cases, concerns raised should be factual to the best of the person's knowledge and should cover the following:
- what has occurred or is thought to have occurred;
 - the background and history of the concern, providing relevant dates;
 - name of person(s) suspected of involvement (if known);
 - reason why they are concerned about the situation;
 - how they can be contacted, e.g. when (after working hours?), where (at home?);
 - has the matter been raised with anyone else; and
 - any other information which may be relevant including possible evidence which should be secured e.g. documents, records.
- The proforma attached at Appendix 2 may be used for making a disclosure.
- 8.3 Individuals wishing to raise the matter in confidence should say so at the outset so that appropriate arrangements can be made to maintain confidentiality.

9. RAISING A CONCERN INTERNALLY - PROCEDURE FOR WORKERS

9.1 The following steps should be followed in most cases when a worker wishes to raise a concern under this policy. However, in exceptional circumstances, all workers have the option to report a matter directly to the Chairperson of the Committee if that is considered the most appropriate course of action due to the nature of the circumstances involved.

Step 1

9.2 A worker wishing to raise a concern under this policy should do so, in the first instance, with their supervisor or line manager.

Step 2

9.3 If a worker feels unable to raise their concerns with their supervisor or line manager, for whatever reason, they should raise the matter with the Governance Manager (NILGOSC's Raising Concerns Champion) either in person, by phone or email at raisingconcerns@nilgosc.org.uk

9.4 Alternatively, staff can also contact a member of the Senior Management Team:

- Head of Governance & Human Resources
- Head of Investment Services
- Head of Finance
- Head of Pension Services
- Head of Pension Policy
- Head of Information Technology

Step 3

9.5 If after Step 1 and/or 2 the worker feels that their concern has not been addressed satisfactorily and believes there is an on-going risk or that the issue is so serious they cannot discuss it with those mentioned above, then the concern should be raised directly with the Secretary or the Deputy Secretary.

Step 4

9.6 In instances where a member of staff wishes to raise a concern under this policy in relation to the Secretary or Deputy Secretary then the matter can be raised directly with the Chairperson of the Management Committee or the Audit & Risk Assurance Committee.

10. RAISING A CONCERN INTERNALLY - PROCEDURE FOR COMMITTEE MEMBERS

10.1 Committee Members are not 'workers' in terms of the definition set out in the legislation. If they wish to raise a concern in the public interest in line with the conditions set out in section 4.1, they should do so, in the first instance, with the Chairperson of the Management Committee.

10.2 If still dissatisfied or in instances where the Member wishes to raise a concern under this policy in relation to the Chairperson, then the matter should be raised directly with the Department for Communities (refer to section 12.3 for contact details).

10.3 Committee Members are publicly appointed by the Minister for Communities. Although communications between the Committee and the Minister will normally go through the Chairperson, all Committee Members have the right of access to the Minister on any matter they consider raises important issues relating to their duties as a Committee Member.

11. RAISING A CONCERN INTERNALLY - PROCEDURE FOR MEMBERS OF THE PUBLIC AND EXTERNAL PARTIES

- 11.1 This section applies to external parties including members of the public, contractors, suppliers who wish to raise concerns internally with NILGOSC under this policy.
- 11.2 It is recommended that contractors or suppliers initially raise concerns within their own internal chain of command and manager responsible for the contract (if applicable). If this is deemed inappropriate or the individual with the concern does not feel comfortable to do so, then concerns can be reported directly to NILGOSC by the individual.
- 11.3 In such instances, concerns can be raised internally via email with the Governance Manager at raisingconcerns@nilgosc.org.uk or to one of the contacts within NILGOSC set out below:
- David Murphy, Secretary: david.murphy@nilgosc.org.uk
 - Nicola Todd, Deputy Secretary: nicola.todd@nilgosc.org.uk
 - Maria Bowers, Head of Finance; maria.bowers@nilgosc.org.uk
 - Denise McElrea, Head of Governance and HR; denise.mcelrea@nilgosc.org.uk
- Alternatively, concerns can be raised by calling or writing to NILGOSC at the contact details below:
- Telephone:** 0345 3197 320
- In writing** for the attention of the Governance Manager (marked confidential) at:
NILGOSC,
Templeton House,
411 Holywood Road,
Belfast,
BT4 2LP
- 11.4 For guidance on what information should be provided when raising a concern, please refer to section 8.2.

12. RAISING A CONCERN EXTERNALLY

- 12.1 While NILGOSC hopes that this policy will make anyone feel supported to raise a concern internally, it is recognised that there may be circumstances where an individual may feel unable to raise a concern internally, or have done so and feel that the matter has not been adequately addressed.
- 12.2 It is preferable that a concern is raised with the appropriate external body than not at all. In Northern Ireland there is a range of possible external contacts, depending on the nature of the concern to be raised. Protect, the UK charity for raising concerns, will be able to advise on such options and the circumstances in which you may be able to contact an outside body (please refer to section 13 on independent advice).

12.3 Depending on the nature of the concern to be raised in relation to NILGOSC, the following external bodies could be appropriate channels for consideration:

1 The Northern Ireland Audit Office (NIAO) which is NILGOSC's Local Government Auditor:

Email: raisingconcerns@niauditoffice.gov.uk

Telephone: +44 (028) 9025 1000 or +44 (028) 9025 1062

In writing to:

Northern Ireland Audit Office (NIAO)

106 University Street,

Belfast

BT7 1EU

The NIAO is a prescribed person in respect of *"the proper conduct of public business, value for money, fraud and corruption in relation to the provision of centrally funded public services and health service bodies."*³

2 The Pensions Regulator (TPR) – the UK regulator of work-based pension schemes. Concerns about pension schemes including breaches of the law can be raised through TPR via the contact details below:

Email: report@tpr.gov.uk

Telephone: 0345 600 7060

In writing to:

The Information Team

The Pensions Regulator

Napier House

Trafalgar Place

Brighton

BN1 4DW

3 Department for Communities (the Department):

Email: andrea.orr@communities-ni.gov.uk; raising.concerns@communities-ni.gov.uk

Telephone: +44 (028) 9081 9410

In writing to:

Andrea Orr (DfC Head of Governance)

Raising Concerns Section

Governance Unit

Department for Communities

9 Lanyon Place,

Lanyon Quay

Belfast BT1 3LP

12.4 Concerns raised by workers to the above external bodies are protected by the Order⁴ in the same way as raising a concern internally. Note that the conditions set out in section 4 equally apply to both raising concerns internally and externally internal and external disclosures and must be met; otherwise the disclosure will not be protected.

12.5 Although this section has provided the details of the most appropriate external bodies relevant to NILGOSC's business area, a full list of external bodies with whom an individual can raise concerns (known as "prescribed persons") and their remit is set out in the Schedule to the Public Interest Disclosure (Prescribed Persons) (Amendment) Order (NI) 2014.⁵ There is an implied role for prescribed persons to play in the whistleblowing process. This role is influenced by the statutory functions specific to each body. The organisations and individuals on the list will have been designated as prescribed persons because they have an authoritative or oversight relationship with the sector, often as a regulatory body. The prescribed person is not responsible for deciding whether the individual who has made the disclosure qualified for protection. However, this will be ultimately decided by an industrial tribunal in contested cases.

12.6 The NIAO has also published a public information leaflet which provides further contact details and advice. This is available on NILGOSC's Intranet and website.

³ Note to DfC ALBs – Raising a Concern (Whistleblowing) Policies, 2023

⁴ Refers also to the Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014.

⁵ <http://www.legislation.gov.uk/nisr/2014/48/contents/made>

13. INDEPENDENT ADVICE

- 13.1 Individuals who are unsure about raising a concern may wish to contact Protect. They provide free, confidential advice at any stage about how to raise a concern about malpractice or wrongdoing witnessed at work. Protect can be contacted at:
- email:** whistle@protect-advice.org.uk
telephone: 020 3117 2520
website: www.protect-advice.org.uk
- 13.2 Staff may prefer to raise their concerns initially with their Trade Union (TU) representative for advice and/or representation. Staff may be supported at any stage by the TU representative or by a work colleague. Alternatively, staff may wish to take legal advice from an independent legal adviser; however, they may not be represented by a legal adviser during the process.

14. HOW NILGOSC WILL HANDLE THE CONCERN RAISED

- 14.1 NILGOSC will take all concerns raised seriously. Some concerns by their nature and scale will require a more formal process of review and investigation than others. The action NILGOSC will take will depend on the nature of each case. For example:
- Explaining the context of an issue to the person raising the concern may be enough to alleviate their worries.
 - Minor concerns may be dealt with straight away by line management
 - A review by internal audit as part of planned audit work might be sufficient to address the issue, e.g. through a change to the control environment
 - There may be a role for external audit in addressing the concerns raised and either providing assurance and recommending changes to working practices
 - There may be a clear need for a formal investigation
- 14.2 Once a concern is raised, the Governance Manager will formally acknowledge receipt of the concern. The Governance Manager will formally log the concern and direct it on to the most appropriate person in the organisation for proper consideration and action, including undertaking preliminary enquiries if deemed appropriate.
- 14.3 Action may take the form of immediate steps to prevent any damage, legislative breaches and/or the loss of funds and may involve an informal review, an internal inquiry, a more formal investigation or an immediate dismissal of the concern. Any suspected crimes should be reported to the PSNI without delay. **Preliminary enquiries and internal investigations will be conducted in line with the procedures set out in NILGOSC's Fraud & Corruption Response Plan.**
- 14.4 Where preliminary enquiries confirm there is sufficient grounds for the concern, it must be referred to the Governance Manager for full investigation as soon as possible. The Governance Manager will promptly notify the Department.
- 14.5 As part of the assessment/investigation, the Investigating Officer should ensure there is appropriate contact with the individual who raised the concern throughout the investigation. The individual who raised the concern may be interviewed and asked to provide a written witness statement to set out the nature and details of the concern raised and the basis for it. They may also be asked to attend a meeting at which the concern can be discussed.
- 14.6 The individual raising the concern may be asked to think about how they feel the matter might best be resolved and will also be asked to declare any personal interest in the matter at the outset. If requested, a written summary of the concern raised and the proposal on how it will be handled may be provided to the individual who has raised the concern. However, it may not be possible to detail the precise action proposed as this may infringe a duty of confidence. When the investigation has been completed, the person who raised the concern will be informed, in writing, of the outcome and NILGOSC's decision as soon as possible.

- 14.7 Workers who raise a concern should expect that NILGOSC will:
- Formally acknowledge receipt of the concern;
 - Offer the opportunity of a meeting to discuss the issue, so long as the concern has not been raised anonymously;
 - If an investigation is appropriate, formally notify the worker who will be investigating the concern;
 - Respect their confidentiality where this has been requested. Confidentiality should not be breached unless required by law;
 - Take steps to ensure the worker has appropriate support and advice;
 - Agree a timetable for feedback. If this cannot be adhered to, the worker should be advised of such;
 - Provide appropriate feedback; and
 - Take appropriate and timely action against anyone who victimises the worker as a result of raising the concern.
- 14.8 Members of the public raising a concern should expect that receipt of their concern is formally acknowledged and they are provided with an opportunity to meet with the appropriate person in NILGOSC to fully discuss the issue and provide evidence if desired. NILGOSC should provide an indication of how the matter might be progressed and respect confidentiality where requested. NILGOSC should also provide an indication of when they may expect feedback and the provision of appropriate feedback.
- 14.9 Individuals raising a concern should maintain reasonable expectations with regards to NILGOSC dealing with the concern. Whilst NILGOSC will treat all concerns seriously, provide due consideration and ensure they are handled fairly and properly in line with this policy, not all cases will require a full investigation and the individual who raised the concern may not always get the outcome they want or expect. Individuals should bear in mind that there may be other circumstances, of which they are unaware, that may put a different perspective on the concerns. Where this occurs, NILGOSC will explain the possible courses of action that may be taken as a result and endeavour to inform the individual of the proposed course of action where appropriate.
- 14.10 The Governance Manager and/or the Investigating Officer will update and maintain the central log from notification of the concern raised until its conclusion. The log will be monitored and maintained for all concerns, whether a formal investigation takes place or not. The log will only be accessible by the appropriate staff in the organisation deemed necessary and relevant to concerns and investigations.
- 14.11 Workers will be notified of any changes to NILGOSC's policies or procedures as a result of investigations resulting from raised concerns, ensuring anonymity and confidentiality is maintained.

15. MANAGEMENT RESPONSIBILITIES

- 15.1 Managers may be the first point of contact for workers raising a concern and it is essential that they fulfil their responsibilities in a way that is supportive. This will give the person assurance that they have done the right thing by raising the concern. Managers who receive concerns from workers should:
- Have a positive and supportive attitude towards workers raising a concern;
 - record as much detail as possible about the concern being raised and agree this record with the worker;
 - be aware of the process following the raising of a concern and explain this to the worker;
 - make sure the worker knows what to expect, for example in relation to feedback on their concern;
 - assure the worker that their confidentiality will be protected as far as possible, if they request this (see page 40);
 - make no promises and manage the expectations of the worker;
 - make clear that your organisation will not tolerate harassment of anyone raising a genuine concern and ask the worker to let you know if this happens;
 - refer the worker to available sources of support, for example Protect or their union; and
 - pass the information as quickly as possible to those within your organisation responsible for dealing with concerns (usually someone within senior management), so that the appropriate procedures for consideration and investigation of the concern can be initiated.
- 15.2 All line managers who may receive concerns from workers should have been given appropriate training on the content and operation of this policy and undertaking investigations, where appropriate.

16. REPORTING

- 16.1 The Governance Manager or another senior manager, as appropriate, should be notified promptly of all concerns raised under this policy. All concerns raised under this Policy will be reported to the Department (see section 12.3), however no personal data will be disclosed.
- 16.2 All reported concerns raised and the progress of any investigations will be reported to the Audit & Risk Assurance Committee and Management Committee, as part of the quarterly Anti-Fraud & Concerns Raised report.

17. RECORDS

- 17.1 Records of concerns raised, including all investigative work carried out and the outcome, will be maintained securely by NILGOSC in line with the requirements of NILGOSC's Retention and Disposal Schedule.

18. AWARENESS TRAINING

- 18.1 NILGOSC will regularly communicate to all existing workers, Committee Members, external parties and members of the public the avenues open to them under this policy. New staff and Committee Members will be made aware of this policy through induction training. External parties and members of the public will be made aware of this policy through contract agreements, NILGOSC communications and/or publication on NILGOSC's website.
- 18.2 The policy will also be published on the NILGOSC Intranet and website.

19. REVIEW

- 19.1 This policy will be reviewed at minimum intervals of three years, or more often as required. The Governance Manager is responsible for the maintenance and review of this policy.

Reviewed: October 2020 and October 2023

Approved: 27 November 2023

Next review due: October 2026

APPENDIX 1

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



