



Department of

Finance

An Roinn

Airgeadais

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DEPARTMENT OF FINANCE

**RAISING CONCERNS
(WHISTLEBLOWING) POLICY**

DOCUMENT CONTROL

(i) SUMMARY

This document provides guidance for Department of Finance (DoF) staff and non-staff in respect of Raising Concerns.

(ii) DOCUMENT STATUS HISTORY

Version	Issue Date	Section	Reason for Update
1.0	April 2011	Whole document	Initial draft
1.1	April 2021	Key Contacts	Key contacts updated
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(iii) DOCUMENT REVIEW DATE

This document will be reviewed on or before;

March 2024

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Introduction

All of us at one time or another may have concerns about what is happening at work. However, when it is about unlawful conduct, a possible fraud, a danger to the public or the environment, or other serious malpractice, it can be difficult to know what to do.

You may be worried about raising such a concern and may think it best to keep it to yourself, perhaps feeling it is none of your business or that it is only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the department and/or its agencies. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

The purpose of these arrangements is to reassure you that it is safe and acceptable to speak up. They also enable you to raise your concern about such malpractice at an early stage and in the right way. Rather than wait for proof, we would prefer you to raise the matter when it is still a concern.

If something is troubling you of which you think we should know about or look into, please let us know. Please remember that you do not need to have firm evidence of malpractice before raising a concern. However we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

We have implemented these arrangements for you to raise any concern where the interests of others or the organisation itself are at risk. If, however, you wish to make a complaint about your employment or how you have been treated, please use the [NICS Grievance Procedure](#).

If your concern is about possible fraud, you may also wish to refer to our [Anti-Fraud Policy](#) and [Fraud Response Plan](#) which can be found on the DoF website.

Our Assurances to You

Your Safety

We are committed to making whistleblowing work. If you raise a genuine concern under these arrangements, you will not be at risk of losing your job or suffering any form of retribution by us as a result of doing so. Provided you are acting in good faith, it does not matter if you are mistaken. Of course, this assurance does not extend to someone who maliciously raises a matter they know to be untrue.

Confidentiality

We will not tolerate the harassment or victimisation of anyone who raises a genuine concern and with these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law. You should understand that there may be times when we are unable to resolve a concern without revealing your identity, for example where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

Anonymity

Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter, to protect your position, or to give you feedback. Accordingly, while we will consider anonymous reports, these arrangements are not well suited to deal with concerns raised anonymously.

If you are unsure about raising a concern you can get independent advice from Public Concern as Work (see contact details under Independent Advice).

How to Raise a Concern

The Public Interest Disclosure Order (1998) is the legislation which covers employees raising concerns. However, following a Public Accounts Committee review, the definition is now broader and includes others who raise concerns (for example contractors, members of the public etc). The following sections explain how both members of staff and non-staff can raise a concern.

Raising Concerns: Members of Staff

Step One

If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager or with their immediate manager. This can be done orally or in writing.

Step Two

If, for whatever reason, you feel that raising it with your line manager or their immediate manager is not appropriate or it has not worked, please raise the matter with your Head of Branch / Division or with one of the following:

<p><u>Head of Internal Audit</u></p> <p>Michael Matthews Telephone: 028 9037 8603 (Ext 88603) michael.matthews@finance-ni.gov.uk</p>	<p><u>Finance & Corporate Services Director</u></p> <p>Stewart Barnes Telephone: 028 9025 4723 (Ext 54723) stewart.barnes@finance-ni.gov.uk</p>
<p><u>Central Procurement Director</u></p> <p>Sharon Smyth Telephone: 028 9081 6209 (Ext 76209) Sharon.Smyth@finance-ni.gov.uk</p>	<p><u>Head of Organisational Development, Land & Property Services</u></p> <p>Tracey Newell Telephone: 028 9033 6089 (Ext 56089) tracey.newell@finance-ni.gov.uk</p>
<p><u>NI Statistics and Research Agency Business Development Manager</u></p> <p>Conor McKiernan Telephone: 028 9025 5098 (Ext 55098) conor.mckiernan@nisra.gov.uk</p>	<p><u>Corporate Governance Branch</u></p> <p>raising.concerns@finance-ni.gov.uk</p>

If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

Step Three

If these channels have been followed and you believe there is an ongoing risk, or you feel the matter is so serious that you cannot discuss it with any of the above, you can raise your concern directly with:

<p><u>Permanent Secretary</u></p> <p>Neil Gibson Telephone: 028 9081 6590 (Ext 76590)</p> <p>Neil.Gibson@finance-ni.gov.uk</p>	<p><u>Chief Executive of Northern Ireland Statistics & Research Agency (NISRA)</u></p> <p>Philip Wales Telephone: 028 9038 8430 (Ext 82630)</p> <p>Philip.Wales@finance-ni.gov.uk</p>
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If your concern is about a breach of the Civil Service Code of Ethics, you may raise your concern directly with the Civil Service Commissioners for Northern Ireland. (While it is the Commissioners' preference that issues under the Code of Ethics are raised, in the first instance, internally within the relevant Department, there may be circumstances when Commissioners would accept an appeal without this having occurred. Commissioners will examine each case on its merits.)

Raising Concerns: Non Staff

Step One

If you have a concern about malpractice that you would like to report, please raise the matter (orally or in writing) with one of the following:

<u>Head of Internal Audit</u> Michael Matthews Telephone: 028 9037 8603 (Ext 88603) michael.matthews@finance-ni.gov.uk	<u>Finance & Corporate Services Director</u> Stewart Barnes Telephone: 028 9025 4723 (Ext 54723) stewart.barnes@finance-ni.gov.uk
<u>Corporate Governance Branch</u> raising.concerns@finance-ni.gov.uk	

If you want to raise the matter in confidence, please say so at the outset so that appropriate arrangements can be made.

Step Two

If the above channels have been followed and you believe there is still an ongoing risk, you can raise your concern directly with:

<u>Permanent Secretary</u> Neil Gibson Telephone: 028 9081 6590 (Ext 76590) Neil.Gibson@finance-ni.gov.uk	<u>Chief Executive of Northern Ireland Statistics & Research Agency (NISRA)</u> Philip Wales Telephone: 028 9038 8430 (Ext 82630) Philip.Wales@finance-ni.gov.uk
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How We Will Handle the Matter

Once you have told us of your concern, we will look into it to assess initially what action should be taken. This may involve an informal review, an internal inquiry or a more formal investigation. Where it is decided that a formal investigation is necessary the overall responsibility for the investigation will lie with a nominated "investigation officer." In any event, we will tell you who is dealing with the matter, how you can contact him or her, and whether your further assistance may be needed. If you request, we will write to you summarising your concern and setting out how we propose to handle it.

When you raise the concern you may be asked how you think the matter might best be resolved. If you do have any personal interest in the matter, we

do ask that you tell us at the outset. If your concern falls more properly within the Grievance Procedure we will tell you.

We will give you as much feedback as we properly can, and if requested, we will confirm it in writing. However, we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.

It is considered best practice that an analysis of the whistleblowing caseload should be reported regularly to the Audit Committee and the Board ([NIAO Good Practice Guide - Raising Concerns in the Public Sector](#)). The responsibility to ensure this takes place rests with the Finance & Corporate Services Director.

Independent Advice

If you are unsure whether or how to raise a concern or you want confidential advice at any stage, you may contact your union. You may also contact the independent charity **Protect** on **020 3117 2520** or by email at whistle@protect-advice.org.uk. Their lawyers can talk you through your options and help you raise a concern about malpractice at work. For more information, you can visit their website at <https://protect-advice.org.uk/>

External Disclosures

While we hope we have given you the reassurance you need to raise your concern internally with us, we recognise that there may be circumstances where you can properly report a concern to an outside body. In fact, we would rather you raise a matter with the appropriate regulator – such as the Northern Ireland Audit Office or the Health and Safety Executive of Northern Ireland - than not at all. Public Concern at Work (or your union) will be able to advise you on such an option and on the circumstances in which you may be able to contact an outside body safely.

Conclusion

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using these 'Raising Concern' (whistleblowing) arrangements you will help us to achieve this.

Please note, this document has been developed to meet best practice and comply with the Public Interest Disclosure (NI) Order 1998 (PIDO) which provides employment protection for individuals who raise a matter of concern. For more information on the law, follow this [link](#) to view the legislation or go to <https://protect-advice.org.uk/> for guidance and/or NI Direct Government Services at: <http://www.nidirect.gov.uk/protection-of-whistleblowers>