



**WFSA**  
WORLD FEDERATION OF SOCIETIES OF  
ANAESTHESIOLOGISTS

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## **WHISTLEBLOWING POLICY**

*This policy also applies to WFSA (UK), Charity Number 1166545*

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### **1. Introduction**

It is important that criminal activity, fraud, misconduct or any other wrongdoing by staff or associated personnel or others volunteering on behalf of WFSA is reported and properly dealt with in a timely, responsible and confidential manner.

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with and should be read in conjunction with all other WFSA policies, including the Code of Conduct and our Safeguarding Policy.

As a UK-headquartered organisation, WFSA abides by UK whistleblowing principles and procedures.

### **2. Background**

The Public Interest Disclosure Act 1998 amended the Employment Rights Act 1996 to provide protection for workers who raise legitimate concerns about specified matters in the public interest. These are called 'qualifying disclosures.' A qualifying disclosure is one made by an

employee who has a reasonable belief that any wrongdoing including the following for example, is being, has been, or is likely to be, committed:

- A criminal offence;
- A miscarriage of justice;
- An act creating risk to health and safety;
- An act causing damage to the environment;
- A breach of any other legal obligation;
- Concealment of any of the above.

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. You have no responsibility for investigating the matter – it is the CEO's and President's responsibility to ensure that an investigation takes place.

Workers who make a protected disclosure are protected against dismissal and victimisation in respect of the disclosure. We encourage you to raise your concerns under this procedure in the first instance.

### **3.Scope**

This policy applies to:

- All staff contracted by WFSA;
- Our volunteers, including Board, Council and Committee members along with others who give their time freely to advance the mission and vision of WFSA;
- Other associated personnel, including interns, scholars and fellows, agency staff, and anyone from a Member Society, partner organisation or institution that is involved in WFSA' work or working on behalf of WFSA.

We therefore require all the above-listed individuals to raise concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run.

### **4.Principles**

In relation to whistleblowing, all staff and volunteers should abide by UK law or the law of the country they are volunteering in. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of WFSA, including volunteers, should be watchful for illegal or unethical conduct and report anything of that nature of which they become aware.

Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.

No employee or other person working on behalf of WFSA, including volunteers, will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker or volunteer will not be prejudiced because they have raised a legitimate concern.

Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.

If misconduct is discovered as a result of any investigation under this procedure, the WFSA's disciplinary procedure will be used, in addition to any appropriate external measures being taken.

Maliciously making a false allegation is a serious disciplinary offence.

An instruction to cover up any wrongdoing is in itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter to the CEO or the President. If the instruction has come from the CEO, then the President should be notified.

#### **4. 5. Procedure for Disclosures**

This procedure is for disclosures about matters other than a breach of contract of employment which should be raised via the Grievance Procedure found in the Staff Handbook. This procedure can be used to disclose information about a wide range of issues, including, but not withstanding, Safeguarding, Code of Conduct and Conflicts of Interest.

##### **Stage 1a**

If you have serious concerns relating to the conduct of WFSA employees, volunteers, consultants and partners working on our behalf, or to projects we are funding with a partner then we would encourage you to raise these with us.

You can submit a confidential report to this email address: [whistleblowing@wfsahq.org](mailto:whistleblowing@wfsahq.org). This address is monitored by the Partnerships Manager.

Alternatively, concerns can be sent to [governance@wfsahq.org](mailto:governance@wfsahq.org). This is monitored by the Governance Team.

If you think that someone is at immediate risk of harm, please contact the relevant local authorities. If you are in the UK, you can contact the police by dialling 999.

The Partnerships Manager and Governance Team will respond to the concerns raised in confidence, including further discussion with the person making the incident report if appropriate / desirable to do so. On receipt of the incident report, an investigation will be initiated under the direction of the CEO.

##### **Stage 1b**

Concerns can also be raised directly with the CEO ([ceo@wfsahq.org](mailto:ceo@wfsahq.org)) (see Stage 2 if the CEO is involved), who will arrange with the President to conduct an investigation into the matter. The investigation may involve you and other relevant individuals giving a written statement (confidentiality will be maintained). Any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account, and you will be asked to comment on any additional evidence obtained.

The CEO will take any necessary action in consultation with the President, including reporting the matter to the WFSA Board and any appropriate government department or regulatory agency. The CEO will also invoke any disciplinary action required if relevant.

On conclusion of any investigation, you will be told the outcome and what WFSA has done, or proposes to do, about the matter in hand. If no action is to be taken, the reason for this will be explained.

## **Stage 2**

If you are concerned that the CEO is involved in the wrongdoing, has failed to undertake a proper investigation, or has failed to report the outcome of the investigations to the relevant individuals outlined above, you should raise the matter in confidence with the President.

The President will arrange for a review of the investigation to be carried out, make any necessary enquiries, and make their own report to the WFSA Board.

## **Stage 3**

If on conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. In the UK this includes:

- HM Revenue & Customs;
- The Health and Safety Executive;
- The Environment Agency;
- The Serious Fraud Office;
- The Charity Commission;
- The Pensions Regulator;
- The Information Commissioner;
- The Financial Conduct Authority.

You can find the full list in The Public Interest Disclosure (Prescribed Persons) Order 2014: [www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496899/BIS-16-79-blowing-the-whistle-to-a-prescribed-person.pdf)

## **6.Data Protection**

When an individual makes a disclosure, we will process any personal data collected in accordance with the data protection and UK-GDPR policies. Data collected from the point at which the individual makes the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.