

The Institute of Trichologists

Whistle Blowing Policy

1. Introduction

Assessing the risks to allow our staff, students and members to raise relevant disclosures without fear of victimisation or other adverse repercussions is an integral part of The Institute of Trichologists.

The Institute of Trichologists is committed to adhering to the policy set out below.

2. Applicability of Policy to Organisation

This policy relates to The Institute of Trichologists (IOT) (we, us, our etc.) and The Trichologists Educational and Hospital Trust (TEHT).

This policy applies to board directors, trustees, staff, members and students of all the following entities:

- Institute of Trichologists
- The Trichologists Educational and Hospital Trust

The Institute of Trichologists is referred to as the IOT throughout this policy.

The Trichologists Educational and Hospital Trust is referred to as TEHT throughout this policy.

2.1 Scope and Purpose of Policy

The purpose of this policy is to allow board directors, trustees, staff, members and students to raise relevant disclosures without fear of victimisation or other adverse repercussions.

The IOT respects the legal jurisdictions of all countries in which it operates. As such, this policy extends to all of the IOT's dealings and transactions in all countries in which it or its students or members operate.

2.2 Policy statement

The IOT are committed to the highest standards of integrity, openness and probity. Our employment and training practices foster environments that are free from wrongdoing, malpractice, or corruption.

2.3 Linked Policies

This policy should be read in conjunction with IOT's:

- Conflict of Interest Policy (held within the Code of Professional Practice and Ethics)
- Complaints Procedure

2.4 Location and access to the Policy

The Whistleblowing policy is located as follows:

- Staff Induction - all staff are provided with a copy and receive training surrounding this policy
- Website: Policies and Procedures section
- Google Classroom

2.5 Persons responsible for the Policy

- Manager of Education within the IOT
- Board Directors of the IOT

3. Guidance Notes for the Whistleblowing Policy

3.1 Who is the Policy for

This policy applies to you if you are working for the IOT, TEHT or are:

- A student, trainee or apprentice
- a contracted worker working for or on behalf of the IOT or TEHT
- A contracted employee of the IOT
- A Registered Member of the IOT

The IOT and the TEHT is not a Prescribed Body, we cannot offer protection of employment rights to persons other than our staff.

For more information on your rights, we encourage you to seek independent advice. Please see <https://www.gov.uk/whistleblowing>.

3.2 Protection and abuse under this Policy

The policy offers protection to IOT and TEHT board directors, trustees, staff, members or students who disclose relevant information (as outlined in 1.3 below), provided that the board director, trustee, staff, member or student reasonably believes that disclosure:

- is made in good faith
- demonstrates that corruption, bad practice or wrongdoing has happened; is highly likely to have happened or is likely to happen
- is disclosed to an appropriate person, as outlined further in this document.

Matters raised in good faith which are subsequently realised as unfounded will continue to be treated as made in good faith.

Any abuse of the policy, or disclosures made with demonstrable malicious or otherwise ill-intent will be treated seriously and may lead to consequential disciplinary action and the imposition of relevant sanctions.

3.3 What we consider to be 'whistleblowing'

Whistleblowing is a term used when a board director, trustee, staff, member or student discloses relevant information relating to wrongdoing, bad practice, corruption, malpractice, maladministration and/or the possible covering up of these actions. We consider examples of disclosures to comprise of, but not be limited to:

- a criminal offence (for example fraud or bribery)
- a failure to comply with legal obligations
- a failure to adhere to regulation and/or mandatory documentation
- where a person (including a board director, trustee, staff, member or student) has committed, is committing or is likely to commit malpractice or maladministration, including but not exclusive to financial malpractice
- any action intended to obfuscate or deceive, particularly but not exclusively relating to actions which has, or may have, resulted in personal and/or financial gain
- health, safety or environmental risks
- concealment of information relating to any of the above.

3.4 Anonymous disclosures

The IOT and TEHT may consider anonymous disclosures at the discretion of the Chairman. The following will be taken into account when deciding whether the IOT or TEHT will consider an anonymous disclosure:

- the seriousness of the concern raised
- the credibility of the concern raised
- the likelihood that we can confirm the allegation from attributable sources.

In all cases, we strongly advise that consideration be given to making the disclosure on a named, confidential basis, under the protection of this policy. Anonymous disclosures are more difficult to investigate and corroborate (as there is no named individual to gain further information from, if required) and anonymous allegations may appear less credible. If an anonymous disclosure is accepted, the Chairman will investigate providing we have enough information. If not, we may log the allegation internally, and may use it for future reference / decision making / actions, if appropriate.

3.5 Confidentiality

Where asked to do so, we will always endeavour to keep the identity of the board director, trustee, staff, member or student raising a disclosure under this policy confidential. By law and regulation, we may need to release disclosures to:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud)
- the courts (in connection with any court proceedings)

- another person to whom we're required by law to disclose your identity
- relevant regulator(s) (e.g. the regulator(s) who are responsible for the standards of our qualification(s) and products).

4. Whistleblowing Procedure

4.1 Making a whistleblowing disclosure

The individual would normally be expected to raise concerns in person with the IOT/TEHT's Chairman, or by contacting the Manager of Education.

If an allegation relates to the Chairman or Manager of Education, an IOT Board Director should be contacted in this instance. If an allegation within the IOT/TEHT is made by an external party, such as one of our contractors, the disclosure should be made in the first instance to the relevant person at the organisation concerned. For example, whistleblowing disclosures would normally be raised with the IOT/TEHT's most appropriate staff member, tutor or assessor. If you feel it is not possible to raise a disclosure in this manner, or you feel that the disclosure hasn't adequately been addressed by the organisation, you should contact an independent body e.g. <https://www.gov.uk/whistleblowing>.

You may also highlight the information to us using our Complaints Procedure. You will need to outline why you feel unable to progress the matter through the party's own processes, and/or provide evidence (not merely opinion) as to why your concerns have not been addressed. On request, you will be guided further in this aspect, on a confidential basis.

Please note, we may, but are not obliged to accept a disclosure about a third party where we believe it is reasonable for the disclosure to be made to that party; that you have not fully exhausted the party's processes, or we are satisfied that the party has reasonably dealt with your concerns.

4.2 Information we will need regarding disclosures in all cases

We require as much information as possible in relation to disclosures, for example the details of the alleged incident, including dates and times and the names of the individual(s) involved.

We will need to understand whether other persons (e.g. other board directors, trustees, staff, members or students) may have been affected by the incident, as we may be required to inform relevant external parties, such as the police, funding and regulatory agencies and/or our regulator(s).

4.3 Accessing confidential information regarding disclosures

We may need to access confidential information when we consider a disclosure. We will ensure that such information is kept secure and only used for the purposes of an investigation and in line with relevant legislation (e.g. data protection). We will not normally disclose the information to third parties unless required to do so (e.g. required onward disclosure to our regulators; the police and/or other relevant statutory bodies).

5. Responding to a whistleblowing disclosure

5.1 What we will do when we receive a whistleblowing disclosure

The receiving Chairman, director or trustee will:

- Acknowledge receipt of the notification. If your disclosure is made by phone or in person, this will be at the time of the call or discussion. If you made your disclosure in writing, we will acknowledge in writing (which may include by email), normally **within five working days** of receipt of the disclosure.
- Conduct an initial review of the disclosure and any additional evidence (or confirm internally by email that another relevant IOT/TEHT member is doing so). As the IOT does not have a human resources department an independent person shall be sought from the board of directors.

The initial review will include all reasonable actions required to establish the truth and accuracy of the claims made in the disclosure. This initial review period will usually be completed **within ten working days** of receipt of the notification.

Following the initial review, a determination will be made by the reviewing staff member as to whether the disclosure will be accepted or rejected. Prior to making this determination, you may be asked for more evidence/information using the contact details you provided to us (if applicable). In this case, you will be informed of any potential impact on timescales. If the disclosure about a board director, trustee, staff, member or student is accepted, the receiving Chairman, trustee or director will inform the board director, trustee, staff, member or student of their right to representation and how to access this right. Acceptance of a disclosure made against a board director, trustee, staff, member of student may also invoke other relevant internal policies (such as disciplinary procedures). The Chairman will advise in this regard.

Once made, the determination will be conveyed to you by email by the reviewing Chairman, trustee or director. If the disclosure is rejected, you will be informed whether you have any alternative rights, such as the right to raise a complaint under our complaints procedure or grievance policy.

If the disclosure is accepted, you will be informed of how we will fully review the issues raised in the disclosure and of our anticipated timescales. In the main (i.e. unless the case is complex or, for example, requires significant external contact), the timescale to fully review a disclosure and make a determination should not normally be longer than **20 working days**. In cases which require escalation (such as those raising significant, validated concerns about the IOT/TEHT), the investigating team member will provide a written overall summary with a judgment and any recommendations to an appropriate board director or trustee for a decision. This may extend the 20-working day period. We will inform you by email or phone of our revised timescales if this is the case.

Where relevant, we will use staff and/or independent external parties who are independent of the matter concerned in our full review. This review may involve us contacting the parties referenced by you.

We will endeavour to maintain confidentiality during the review. We may inform external relevant parties if applicable; update them as necessary, at key stages of the review and may inform them of the final outcome, including any relevant actions or interventions.

In all cases, the investigating team member will provide you with the decision of the review and an overview summary, usually via email, **within 5 working days** of the conclusion of the full review.

The summary:

- will not provide the granular elements of the review, including the details of any investigation or outcome(s)
- will provide sufficient information relating to our actions and decisions
- will only be given subject to the need to protect confidentiality.

The review decision is final and there is no right of appeal against the decision. However, if the decision is based on factual inaccuracy or omission, you may then have the right to raise a complaint. Please see section 4 below.

6. Inaccuracies and Complaints

Should you feel that the final review decision in relation to the whistleblowing disclosure is factually incorrect, you can raise a complaint, please refer to our complaints procedure, or our grievance policy, whichever is appropriate. In doing so, you must provide evidence in relation to the stated inaccuracy. Please note, the decision is not factually incorrect merely if you disagree with the outcome; have a differing opinion on the outcome, or desire a different outcome.

7. How to contact us

IOT/TEHT

Chairman admin@trichologists.org.uk
Manager of Education educationmanager@trichologists.org

We can also be contacted in writing or by phone at:
Institute of Trichologists 107 Trinity Rd
Upper Tooting London
SW17 7SQ
020 4532 6465

Complaints Procedure Change Log:

Issue No.	Date	Reason for change
1	27/05/2022	