



4.7.1 Whistle blowing – for non SGHC staff or volunteers

St George's Hospital Charity is committed to conducting its business at all times in a correct and appropriate manner and in accordance with all legal requirements. All employees and volunteers are expected to adhere to this commitment.

From time to time our public profile may bring activities to the attention of members of the public who are concerned that an activity may have an impact on the reputation or wellbeing of the charity. These activities may be those undertaken by SGHC volunteers, in aid of supporters, in support of fundraisers, third party providers. In the view of the whistle blower these activities may not reach the necessary standards of legal, regulatory, or advisory compliance or the values that the charity espouses.

If the external whistle blower becomes aware of malpractice, a legal breach, fraud or a breach of health and safety taking place, where the nature of the matter makes it difficult or impossible for the matter to be raised with the person(s) undertaking it, they should raise their your concern directly with a member of the Executive Management Team.

A disclosure will be treated seriously and the whistle blower will not suffer a detriment for raising a genuine concern.

We've therefore developed a procedure, in line with the above Acts, to help external parties to raise any concerns about possible wrongdoings at work. Under our procedure, the following are protected disclosures:

Allegations of bribery or corruption, including any bribes/facilitation payments paid by, or received by St George's Hospital Charity or any of its directors, officers or employees; its affiliates or third party representatives; of volunteers or fundraisers;

Breaches of legal and regulatory requirements by the charity or those using the name of the charity or raising funds, including the committal of a criminal offence, a miscarriage of justice or a failure to comply with a legal obligation;

Allegations of the previous conduct of individuals or companies using the name of a charity or raising funds which may inform concerns as to their propriety and suitability to act in support of SGHC charity;

Failure to adopt policies consistent with the Charity's internal operational policies;

Fraud or deliberate error in preparing, evaluating, reviewing or auditing any financial statement;

Fraud or deliberate error in recording and maintaining financial records of the Charity;

Deficiencies in or non-compliance with any of the Charity's internal accounting controls;

Deviating from full and fair reporting of any of the Charity's financial condition in accordance with the Charity Commission guidelines;

Misrepresenting or making false statement to or by a trustee or an executive officer on a matter contained in the financial reports or audit of the Charity;

The health and safety of an individual being endangered or the environment being damaged;

You can make a protected disclosure by reporting the matter to the Chair of charity trustees. But you must also, for legal reasons, report disclosures in categories 3–8 to the Chief Executive. Any disclosure of information from a whistle blower would be as a result of statutory requirements.

If your concern involves your personal safety, please let us know. We must take a balanced view about any allegations which may require us to contact the police.

We will investigate any whistle blowing concerns as raised by you and may or may not tell you about the outcome, as we judge appropriate. The Executive Management Team will not reveal your identity to anyone within the charity unless required by our trustees, and only if they require it to discharge their legal responsibilities.

Amends made after trustee meeting in March 2018.