

## **IWFM Whistleblowing Policy**

**Effective Date:** 05 January 2026

**Approved By:** IWFM Board

**Version:** Final

### **Leadership Statement**

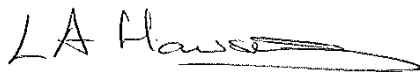
At IWFM, integrity, transparency, and ethical conduct are the foundation of everything we do.

Speaking up when something doesn't feel right is not only welcomed, it is essential. Whether you are a member of staff, a volunteer, a member of our Institute, or anyone working with us, your voice matters. If you witness wrongdoing, unethical behaviour, or practices that could cause harm, I want you to know that you can raise your concerns safely, confidentially, and without fear of reprisal.

This Whistleblowing Policy exists to protect you and to reinforce our collective commitment to doing what is right. We will not tolerate retaliation against anyone who raises a genuine concern in good faith. Instead, we will listen, investigate fairly, and act with integrity.

Values-led leadership means creating an environment where openness is encouraged and concerns are treated as opportunities to learn and improve. I am personally committed to ensuring that IWFM remains an organisation where ethical conduct is lived, not just documented.

Together, we can build and maintain a culture of trust, respect, and accountability.



Linda Hausmanis

Chief Executive Officer, IWFM

### **Executive Summary**

This values-based Whistleblowing Policy (hereafter known as the policy) affirms IWFM's commitment to openness, integrity, and accountability. It ensures that anyone connected with IWFM can raise serious concerns about wrongdoing, risk, or unethical conduct without fear of retaliation. This policy supports IWFM's core values and ensures compliance with legal protections under the [Public Interest Disclosure Act 1998](#).

The policy promotes a culture of speaking up by clearly outlining how concerns can be raised confidentially, the support available to whistleblowers, and how concerns will be investigated fairly and consistently. It complements IWFM's broader framework for complaints, conduct, and continuous improvement.

# IWFM Whistleblowing Policy

## 1. Introduction

IWFM is committed to the highest standards of integrity, accountability, and ethical conduct. This policy provides a safe and supportive route for individuals to raise genuine concerns about serious wrongdoing without fear of retaliation. It ensures that such concerns will be taken seriously and investigated promptly, fairly, and in line with our values and legal responsibilities.

This policy applies to all relevant individuals including IWFM employees, members, volunteers, executive and non-executive directors, and anyone working on behalf of the Institute.

Whistleblowing is distinct from personal complaints, employment grievances, or member conduct concerns, which are addressed under:

- [IWFM Complaints and Disciplinary Policy](#).
- IWFM Staff Grievance Procedure or Disciplinary Policy.
- [IWFM Members' Code of Professional Conduct](#).
- [IWFM Bribery Policy](#) and [internal governance frameworks](#).

If you're unsure which route to take, contact [governance@iwfm.org.uk](mailto:governance@iwfm.org.uk) for guidance.

## 2. Accessibility Statement

IWFM is committed to ensuring that everyone can access and understand this policy, regardless of background, ability, or circumstance.

If you require this policy in an alternative format (such as large print, audio, or a different language), please contact us at [governance@iwfm.org.uk](mailto:governance@iwfm.org.uk) or call the IWFM office for support. We will make every reasonable effort to accommodate accessibility needs promptly and respectfully. If you require assistance in making a complaint including help with reading, writing, or digital access our team will provide guidance or refer you to a trusted support resource. This commitment reflects our values of inclusivity, respect, and equal access to all who interact with IWFM.

## 3. Purpose and Principles

This policy exists to:

- Enable individuals to raise concerns about serious wrongdoing in good faith.
- Offer protection against victimisation or retaliation.
- Ensure IWFM upholds legal and ethical standards across all its operations.

The policy supports our values of:

- **Integrity** – Encouraging openness and honesty
- **Respect** – Protecting those who speak up
- **Accountability** – Responding fairly and transparently

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- **Learning** – Using concerns to improve systems and culture

Concerns raised under this policy may relate to:

- Criminal offences (e.g., fraud, bribery, theft).
- Health and safety risks.
- Environmental harm.
- Miscarriages of justice.
- Breaches of legal obligations or regulatory rules.
- Concealment of wrongdoing.
- Sexual Harassment.

### 4. Legal Protection under the Public Interest Disclosure Act 1998

This policy is underpinned by the Public Interest Disclosure Act 1998 (PIDA), which protects individuals who raise concerns in the public interest.

Under PIDA, a disclosure is 'qualifying' and 'protected' when it:

- Is made in good faith.
- Relates to one of the six categories of serious wrongdoing (see Section 2).
- Is based on a reasonable belief that the information is true or likely to be true.
- Is made to an appropriate person (usually within the organisation).

#### 4.1 Who Is Protected?

PIDA protections apply to:

- Employees (current and former).
- Contractors.
- Trainees.
- Volunteers (while not strictly covered in statute, IWFM applies the same principles).
- Members working in a representative capacity.

You do not need to have proof of the wrongdoing only a genuine and reasonable belief.

#### 4.2 What's Not Protected?

While IWFM strongly encourages openness and will support those who raise concerns in good faith, certain types of concerns do not fall within the legal protections of whistleblowing under the Public Interest Disclosure Act 1998 and are more appropriately addressed through other procedures.

The following are **not protected** under this policy:

- **Personal employment-related grievances**, such as dissatisfaction with salary, workload, or interpersonal disputes, these should be raised under the IWFM Staff Grievance Policy.

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- **Concerns about decisions related to member assessments, qualifications, or results**, these should be addressed via the appropriate academic appeals or assessment review procedures and not through this whistleblowing route.
- **Complaints regarding service quality, staff conduct, or organisational decisions**, these are handled under the IWFM Complaints and Disciplinary Policy.
- **Malicious, knowingly false, or vexatious allegations** – such disclosures may be subject to conduct procedures.
- **Public disclosures to external parties** (e.g., media or social platforms) made without following proper internal procedures, these may forfeit legal protection under whistleblowing legislation.

If you are unsure whether your concern qualifies as whistleblowing, you are encouraged to seek confidential advice from the IWFM Company Secretary or refer to our complaints and grievance frameworks.

### 4.3 IWFM's Responsibility

IWFM is legally and ethically committed to:

- Taking all protected disclosures seriously.
- Ensuring no one suffers harm, disadvantage, or dismissal for raising a concern in good faith.
- Acting promptly to investigate and respond to disclosures.

Creating a culture where individuals feel safe and supported to speak up.

## 5. How to Raise a Concern

Concerns should be raised confidentially and without delay. Whistleblowers should not investigate the matter themselves or alert anyone suspected of wrongdoing.

Depending on your role:

- **Staff:** Speak to your line manager, or if inappropriate, the Company Secretary or Chair of the Audit & Risk Committee.
- **Members or Volunteers:** Contact the Company Secretary or any member of the Audit & Risk Committee.
- **Non-Executive Directors:** Contact the Company Secretary, CEO, or Audit & Risk Committee Chair.

Independent advice is available from solicitors, trade unions, or whistleblowing charities. Disclosures to the press or external parties should only occur in line with legal protections and after following this policy.

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### 6. Anonymity and Confidentiality

Concerns can be raised anonymously, but this may limit IWFM's ability to investigate or provide feedback. All disclosures will be treated in confidence as far as possible. Identities will be protected unless disclosure is legally required or essential for fair investigation.

### 7. Support for Whistleblowers

Those who raise concerns will be:

- Treated with respect and dignity.
- Provided with a named contact for updates and support.
- Protected from victimisation or retaliation.
- Offered wellbeing or pastoral support throughout and after the process.

Any reprisal against a whistleblower will be considered a serious breach of conduct and dealt with accordingly.

### 8. Investigation Process

Once a concern is raised:

- A senior staff member (or appropriate delegate) will conduct an initial severity assessment.
- The whistleblower may be asked to provide a written account.
- Further investigation may include interviews, documentation reviews, or third-party involvement.

Outcomes may include:

- No further action.
- Referral to another IWFM policy (e.g., grievance or complaints policy).
- Internal investigation.
- External referral (e.g., to police or regulatory body).
- Independent third-party investigation.

### 9. Communication and Feedback

Whistleblowers will receive a written acknowledgement within 5 working days and ongoing updates where possible. A written summary of the outcome will be shared, noting that some details may remain confidential (e.g., HR matters or legal advice).

### 10. Appeals

If dissatisfied with the outcome, the whistleblower may appeal to:

- The Company Secretary or the CEO (if staff-related).
- The Chair of the Audit & Risk Committee (any person).
- The Chair of the IWFM Board (if a member is involved).

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Final appeal outcomes will be binding. If still unsatisfied, individuals may escalate externally to an appropriate regulator but are encouraged to inform IWFM before doing so.

### 11. Learning and Organisational Improvement

All whistleblowing cases are reviewed by the Audit & Risk Committee. Findings may inform improvements to:

- Policies and procedures.
- Risk controls.
- Staff and member training.

Where appropriate, learnings may be shared anonymously within the organisation to encourage a culture of openness, trust, and continual improvement.

### 12. Summary of Timescales

The table below outlines the expected timeframes for each stage of the whistleblowing process. These are intended to promote fairness, transparency, and accountability, while ensuring each case is addressed thoroughly.

Stage	Action	Timeframe
Raising a Concern	Initial written or verbal report	As soon as possible
Acknowledgement	IWFM confirms receipt of concern	Within 5 working days
Initial Review	Preliminary assessment by senior officer	Within 10 working days
Investigation	Full internal or external review (if required)	Within 30–60 days
Updates to Whistleblower	Progress updates during investigation	Regular, as agreed
Outcome Notification	Summary of findings and actions shared	Within 10 working days of conclusion
Appeal (if applicable)	Submit appeal on outcome	Within 25 working days
Final Appeal Decision	Appeal review and communication of final outcome	Within 21 working days of appeal

### Support and Contact

For advice on this policy or to report concerns, please contact:

**IWFM Company Secretary at:** [Governance@iwfm.org.uk](mailto:Governance@iwfm.org.uk)