



Whistleblowing Policy

Policy Statement

Community Pharmacy England is committed to maintaining the highest standards of honesty, openness and accountability recognising that all colleagues have an important role to play to achieve this goal.

No organisation is immune from unknowingly harbouring malpractice, whether it be intentional or unintentional. Colleagues are usually the first to know if someone inside or outside the organisation could be acting improperly but may feel apprehensive about voicing their concerns. This may be because they believe that voicing concerns could be disloyal to their colleagues, the organisation or that their concerns may not be taken seriously or will be penalised in some way.

Community Pharmacy England believes it is in everyone's interest for a colleague who has knowledge of any wrongdoing to speak up. We take improper behaviours and / or wrongdoing very seriously, whether it is committed by senior managers, staff, Committee members, suppliers, or contractors.

Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within Community Pharmacy England without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It recognises a worker's legal rights to make a protected disclosure to certain prescribed persons or bodies under the Public Interest Disclosure Act 1998 and any subsequent legislation, as incorporated into the Employment Rights Act 1996.



It is intended to encourage and enable you to raise serious concerns within the organisation rather than ignoring a problem or 'blowing the whistle' outside.

This policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

Scope of the Policy

This Policy is intended to enable those who work for Community Pharmacy England who become aware of wrongdoing affecting some other person or service at their organisation to report their concerns at the earliest opportunity so that they can be properly investigated. The policy applies to employees of Community Pharmacy England, and others working for these organisation such as contractors and agency workers.

The whistleblower must reasonably believe that they are acting in the public interest. The statutory categories for wrongdoing are:

- a criminal offence
- a breach of any legal obligation
- a miscarriage of justice
- endangering an individual's health and safety
- damage to the environment
- deliberate concealment of information about any of the above.

Examples of wrongdoing might include (but are not restricted to):

- unsafe working conditions

- lack of, or poor, response to a reported safety incident
- inadequate induction or training for staff
- suspicions of fraud
- a bullying culture (across a team or organisation rather than individual instances of bullying).

The Whistleblowing Policy is not intended to replace existing procedures. For example:

1. Concerns relating to your own treatment as an employee should be raised under the relevant HR procedure
2. Complaints against Committee members are dealt with under a separate complaints procedure.

Support for you

Community Pharmacy England is committed to good practice and high standards and to being supportive of you as an employee.

We recognise that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your organisation, your colleagues and those for whom you provide a service.

We will not tolerate any harassment or victimisation of a whistleblower and will take appropriate action to protect you when you raise a concern in good faith. The Public Interest Disclosure Act 1998 makes it unlawful for an organisation to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure in accordance with the Act.

Any concern raised will be treated in confidence and every effort will be made not to reveal your identity if that is your wish.

If the allegation is not confirmed by an investigation but you raised it in good faith, no action will be taken against you, and you will not be at risk of suffering any reprisal as a result. Provided you are acting honestly, it does not matter if you are mistaken or if there is an innocent explanation



for your concerns. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

Protect is the UK's Whistleblowing charity which offers a free and confidential advice line to help whistle-blowers, see: www.protect-advice.org.uk.

Raising a concern

How and to whom you report your concern may depend on its nature, including the sensitivity of the issue involved and who is suspected of wrongdoing. You should normally raise your concern with either:

1. Your line manager
2. Community Pharmacy England's responsible officer for whistleblowing, Gordon Hockey (Director, Legal): Gordon.Hockey@cpe.org.uk
3. Community Pharmacy England's Chief Executive, Janet Morris (janet.morris@cpe.org.uk)

If your concern is about the Chief Executive or you do not feel that it is appropriate to raise your concern with a member of the organisation's staff, you should raise your concern with the Independent Chair who will decide how to proceed ([add email address](#)).

Investigating concerns raised

When a report is received via any of the above channels, an Investigating Officer will be appointed who will be responsible for reviewing the disclosure and determining how to proceed. The Investigating Officer will usually be either the Director, Legal or the Chair of the Governance and People Sub-committee unless a conflict of interest exists where a suitable alternative will be appointed.

The Investigating Officer will make initial enquiries to decide whether an investigation is appropriate and, if so, what form it should take. They will write to you within ten working days of a concern being raised, to acknowledge the disclosure and set out how Community Pharmacy England proposes to deal with the matter, including telling you whether further investigations will



take place and if not, why not. They may decide it is appropriate to refer to another process (eg disciplinary or grievance), or to an external body, for example, the police or a regulatory body.

You will also be provided with information about the support available to you.

If further investigation is required, you will be told what this may involve and the anticipated timeframe. You may be asked for more information. It is likely that you will be interviewed to ensure that the concern you have raised is fully understood. A friend or union/professional association representative may accompany you at these meetings if you so wish. We will do what we can to support you during this process.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

This policy is intended to provide you with an avenue within Community Pharmacy England to raise concerns. Whilst we hope you will be satisfied with any action taken, it is understood that this may not be the case. If you remain dissatisfied or feel it is right to raise the matter outside of Community Pharmacy England in the first instance, you may refer it to a prescribed person or to your Member of Parliament (MP). The full list of prescribed persons and bodies can be found on the UK government website at: [Whistleblowing: list of prescribed people and bodies - GOV.UK](https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies)¹.

Responsible Officer

Community Pharmacy England's Director, Legal is the Responsible Officer and has overall responsibility for the maintenance and operation of this Policy and should be contacted with any queries regarding the policy and process.

The Responsible Office will maintain a register of all concerns raised. They shall prepare an annual report for the Governance and People Sub-committee which shall include a summary of the whistleblowing concerns raised, the function/post to which the concerns related (if not confidential) and any lessons learned. The report will not include any employee names. The aim

¹ www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies-2/whistleblowing-list-of-prescribed-people-and-bodies



of the report is to ensure that whistleblowing reports are handled appropriately and consistently, and all lessons are learned.

Review of the Policy

The Governance and People Sub-committee will review the Policy periodically and recommend any changes to the Committee for its approval.