



# WHISTLEBLOWING POLICY AND PROCEDURE

Updated: February 2026

<a href="#">WHISTLEBLOWING POLICY AND PROCEDURE</a>	1
<a href="#">1. Introduction</a>	1
<a href="#">2. Aim</a>	1
<a href="#">3. Scope</a>	2
<a href="#">4. Protection</a>	2
<a href="#">5. Confidentiality</a>	3
<a href="#">6. Whistleblowing procedure</a>	4
<a href="#">7. Escalation</a>	6
<a href="#">8. Independent advice</a>	6

## 1. Introduction

In2scienceUK conducts its business at all times with the highest standards of integrity and honesty. It expects all its employees to maintain the same standards in everything they do.

It is important to In2scienceUK that any fraud, misconduct or wrongdoing by employees of the organisation is reported and properly dealt with. In2scienceUK therefore encourages all individuals to raise any concerns that they may have about the conduct of others in the organisation or the way in which it is run.

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

This policy and procedure does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

## 2. Aim

The aim of this policy is to:

- Enable and encourage staff and volunteers to raise with In2ScienceUK genuine concerns about suspected wrongdoing at work (whether or not in the whistleblower's area of work) as soon as possible, without fear of reprisal (even if they turn out to be mistaken) and to reassure them that such matters will be dealt with seriously and effectively by In2scienceUK internally.
- To provide staff and volunteers with guidance as to how to raise those concerns.



This policy is separate from In2scienceUK's Grievance Policy and Procedure, which relates to general concerns which an employee may have about their own personal circumstances, such as the way they have been treated at work.

### **3. Scope**

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns.

What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include the following:

- Financial malpractice, impropriety or fraud
- Bribery or corruption
- Failure to comply with a legal obligation or regulatory requirement
- Endangering health and safety
- Damage to the environment
- Criminal activity
- Miscarriages of justice
- Improper conduct or unethical behaviour

### **4. Protection**

Protection is provided under this policy provided:

- The disclosure is being made by a person who falls within the scope of section 3.
- The person making the disclosure is doing so in the reasonable belief that:
  - the information they have tends to show wrongdoing; and
  - that it is in the public interest that they make the disclosure

It is not necessary for the person disclosing to have evidence that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The person has no responsibility for investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.



Any individual who has made a disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

Any member of In2scienceUK who chooses to make a disclosure outside In2scienceUK (including e.g. to the press) may be subject to internal disciplinary procedures.

## **5. Confidentiality**

### **5.1. Discloser**

In2scienceUK will treat all disclosures made in a sensitive manner. In2scienceUK hopes that all individuals feel comfortable to make a disclosure openly. However, in the circumstance in which the individual wants to disclose a concern confidentially, In2scienceUK will endeavour to keep their identity confidential as long as this is compatible with carrying out the necessary investigation into the allegation. During the course of the investigation the source of the information may need to be disclosed, and the individual may be required to make a statement.

### **5.2. Anonymous Allegations**

Individuals are encouraged to put their name to any disclosure. Concerns that are raised anonymously are less impactful and are much more difficult to investigate. In2scienceUK will address these disclosures with discretion, considering: the seriousness of the issue; the credibility of the disclosure; the likelihood of sourcing alternative credible sources. While we seek to protect anonymity, we cannot guarantee that the discloser's identity cannot be deduced by the nature of the concern and/or subsequent investigation. If, contrary to this policy, they then suffer reprisals, it may be difficult to show that this was as a result of them raising a concern, i.e. it may not be possible to protect unidentified people.

## **6. Whistleblowing procedure**

### **6.1. Who to disclose to**

In most cases In2scienceUK would encourage all persons who fall under the scope of those listed in section 3 to first raise any concerns to their In2scienceUK point of contact or, if an In2scienceUK staff their line manager. This will help to direct disclosures through the correct procedures.

If, for any reason you would prefer not to disclose to this individual you can contact the Head of Operations. The Head of Operations has been designated as the officer responsible for considering and investigating disclosures.

If the allegation concerns this officer or their conduct of the investigation then this should be reported to the Chief Executive Officer or any charity trustee.

The discloser must not approach the individual(s) concerned in any disclosure directly, either to make them aware of the disclosure or to investigate the matter personally.

Where the disclosure is concerning safeguarding, our Safeguarding Children & Young People and Safeguarding Vulnerable Adults policies and procedures should be referred to.

## **6.2 Making a disclosure**

Any person who has a genuine reason for their disclosure should feel confident in bringing forward their concerns.

If anyone should try to discourage an individual from coming forward to express a genuine concern, or criticises or victimises someone for making a concern, In2scienceUK will treat this matter very seriously. In the case of In2scienceUK staff this will be treated as a disciplinary matter.

If it should become clear that the procedure under this policy has not been invoked in good faith (for example, falsely or for malicious reasons or to pursue a personal grudge against another employee), this will constitute misconduct and it will be treated as a disciplinary matter.

Any employee who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken.

## **6.3. Disclosure process**

In2scienceUK staff should first contact their line manager, Head of Operations, Chief Executive Officer or charity trustee depending on the circumstance when making a disclosure or reporting an external concern that has been disclosed to them. This can be made via any professional channel of communication the discloser is most comfortable with.

The responsible person to whom the disclosure is made will make a detailed record of the disclosure and consider the information provided to decide whether there are grounds for a further investigation. This may be done in conjunction with other responsible persons within the organisation. In order to make this decision the discloser may be requested to make a written statement. The action taken in response to a disclosure will depend on the nature of the concern.

By way of example, the matters raised may result in one or more of the following:

- No action required.
- Action being taken under other In2scienceUK policies and/or procedures.
- An internal investigation under this policy.
- A referral to the police.
- A referral to In2scienceUK's external auditors.

- A referral to the Charity Commission.
- An independent enquiry.

On making a decision, the discloser will be notified within five working days. Details of this notice will include acknowledgment of receipt of the disclosure and details of who the discloser should contact if they have further questions.

In2scienceUK would urge employees to exhaust the internal processes set out above but, in exceptional or urgent circumstances, it might be appropriate for them to contact an external person or body. Legislation sets out a number of bodies to which qualifying disclosures may be made. These include:

- HM Revenue & Customs;
- Financial Conduct Authority;
- Information Commissioner
- Charity Commission;
- Health and Safety Executive;
- Environment Agency.

#### **6.4. Investigation**

Where further action is required under this policy in relation to a disclosure, this will typically, in the first instance, take the form of an internal investigation. The internal investigator will be the Head of Operations, the Chief Executive or a trustee of In2scienceUK (as appropriate on a case by case basis). However, In2scienceUK may instead decide to arrange for a suitably qualified independent professional to undertake the investigation.

During the investigation, the employee who reported the disclosure may need to be called upon for an interview. They will also be given appropriate updates of progress made during the investigation, whilst bearing in mind the need to respect the confidentiality of other workers as well.

Once the investigation is complete:

- The employee will be given a prompt and thorough explanation about the result of the investigation and any action In2scienceUK is likely to take as a result of it.
- Where the allegation is deemed to be of a serious nature, an appropriate report will be submitted to the Board of Trustees.
- Any action which the investigator decides is required will be taken.

In2scienceUK recognises that there may be matters which cannot be dealt with internally and external authorities may need to become involved, including the police and the Charity Commission. Where this is necessary, In2scienceUK reserves the right to make such a referral without the reporting employee's consent.



## **7. Escalation**

If the individual remains unhappy about the speed or conduct of any further action taken or the way in which their concerns have been resolved, he/she should refer the matter first to the Chief Executive and then to the Chair of the Board of Trustees of In2scienceUK.

## **8. Independent advice**

Individuals can also contact Protect for confidential and independent advice about whistleblowing. Their details are Tel: 020 3117 2520, Email: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk), Website: <https://protect-advice.org.uk/>

Professional Associations and Trade Unions can also offer advice to members considering raising concerns