

**Whistleblowing Policy**

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| **Template Guidance Notes**  Use this template as a base to document your firm’s Whistleblowing Policy. It should be modified to suit your requirements. It is not designed to be definitive.  It should be completed and signed-off by principals of the firm before making available to all staff.  A template is also available to record the firm’s Whistleblowing Policy and Procedures.  Guidance notes and instructions are highlighted in yellow.  Red text indicates personalisation is probably required. |

**Firm Name**

**Whistleblowing Policy**

**Month / Year**

# Whistleblowing Policy

All staff should be aware that they can blow the whistle to the FCA, as the regulator prescribed in *respect of financial services and markets matters under the PIDA (Public Interest Disclosure Act).*

**If you are concerned about possible wrongdoing at work, the Public Interest Disclosure Act 1998(PIDA) provides guidance for dealing with these and other whistle blowing issues in a safe and constructive way. It encourages you to raise concerns internally in the first place.**

## Internal – contacts for whistle blowing

Firm Name hopes that you will feel able to raise any such concern internally, confident that it will be dealt with properly and that all reasonable steps will be taken to protect you from victimisation. If you don’t feel able to raise or resolve a concern with your line manager, please contact XXXX who has been nominated for this purpose, in his/her absence please contact XXXX.

We encourage staff to bring concerns to our attention. We are unlikely to be aware of the situation causing you concern and will appreciate it being brought to our attention so that we can fully investigate and, where appropriate, take action to rectify the situation.

## Public Interest Disclosure Act 1998 (PIDA)

The PIDA states that individuals who make qualifying disclosures of information in the public interest have the right not to suffer detriment by any act or omission of their employer because of the disclosure. A qualifying disclosure is one, which, in the reasonable belief of the worker, suggests that one, or more of the following has been, is being, or is likely to be committed:

* a criminal offence;
* the putting of the health and safety of any individual in danger;
* a failure to comply with any legal obligation;
* damage to the environment; or
* a miscarriage of justice;
* deliberate concealment relating to any of the above.

The PIDA protects you in making a disclosure to your employer where the disclosure meets the requirements set out above and is made in good faith.

## Advice

If you want free, confidential advice on what is protected by PIDA and how best to raise your concern, you can contact for example, the independent charity, Protect on 020 3117 2520, more information is available on their website: / http://protect-advice.org.uk/

Other organisations who can help and may be able to support you include:

* Trade Bodies and Unions
* ACAS https://www.acas.org.uk/
* Citizens Advice https://www.citizensadvice.org.uk/

## External – Financial Conduct Authority

If you are worried about something at work, it may be that you are concerned about something that is relevant to the functions of the FCA.

If you have disclosed your worry internally and you are concerned either by the response or lack or response, or if you feel unable to talk to anyone internally for whatever reason, you can contact the FCA.

The PIDA protects you if you contact the FCA where:

* you satisfy the test for speaking to your employer (see above);
* you reasonably believe the information and any allegations in it are substantially true; and
* you reasonably believe the FCA is responsible for the issue in question.

The FCA considers every report they receive and protects the identity of whistleblowers. The FCA’s website provides useful information regarding this via the below link.

Please note that there are other bodies prescribed under PIDA for a range of matters apart from financial services see www.hmso.gov.uk/si/si1999/19991549.htm and use ‘search’ to find Public Interest Disclosure Act.

## FCA contact details

FCA’s direct whistleblowing number is 020 7066 9200

FCA’s direct email address is whistle@fca.org.uk

Further information is available at https://www.fca.org.uk/firms/whistleblowing

## Please send letters to:

Intelligence Department (Ref PIDA)

Financial Conduct Authority

12 Endeavour Square

London

E20 1JN