Speak-up and whistleblowing procedure

SOP TEMPLATE

Check this template against your local regulations and your own policies before you use it.

SOP no.		Version		Effective date	
Owner		Approver		Review date	

Purpose

To give everyone who works with us a safe way to raise concerns about wrongdoing, to make sure each concern is looked into fairly, and to protect the people who speak up.

Scope

Employees, former employees, contractors, volunteers and suppliers raising a concern about wrongdoing connected with the business. Personal workplace grievances, such as a dispute about pay or a manager, follow the grievance procedure unless they involve wrongdoing.

Responsibilities

Role	Responsibility
Anyone with a concern	Raises it honestly through one of the channels in this procedure.
Speak-up officer (a named senior person, with a backup)	Receives concerns, protects the person's identity, decides how each is handled and gives feedback.
Investigator	Looks into the concern fairly and independently, and reports findings to the speak-up officer.
Owner or board	Makes sure the procedure works, receives summaries, and handles concerns about senior people.

Definitions

Wrongdoing: Fraud, bribery, theft, breaking the law, danger to health or safety or the environment, serious misconduct, or covering any of these up.

Retaliation: Any harm done to someone because they spoke up, such as dismissal, demotion, harassment or being left out.

What you need

- The names and contact details of the speak-up officer and backup
- A confidential way to report, such as a private email address or an outside hotline

Procedure

1. **Raise the concern**

   Tell the speak-up officer, the backup, or the owner, in person, by phone or in writing. Say what you saw, when, who was involved and any evidence.

   - You don't need proof, only reasonable grounds
   - You can report anonymously, but it can make the concern harder to look into

2. **Acknowledge it**

   The speak-up officer acknowledges the concern within a few working days and explains what happens next, unless it was made anonymously with no way to reply.

3. **Protect the person's identity**

   Share the person's identity, or details that would reveal it, only with their consent or where the law allows. Store records where only the speak-up officer can see them.

   > **Caution:** Some whistleblowing laws make it an offence to reveal a protected whistleblower's identity. Check the law that applies to you.

4. **Assess the concern**

   Decide whether it's covered by this procedure, how serious it is, and whether it needs an investigation, another procedure, or reporting to a regulator or the police.

5. **Investigate**

   Appoint an investigator who isn't involved, gather evidence and interview people fairly, and give anyone accused a chance to respond.

6. **Act on the findings**

   Decide what to do, such as disciplinary action, fixing a control or reporting to a regulator, and add actions to the corrective action register.

7. **Give feedback**

   Tell the person who raised it what was done, as far as confidentiality allows, and how to escalate if they're not satisfied.

8. **Prevent and handle retaliation**

   Check in with the person after they speak up. Treat retaliation as serious misconduct and deal with it under the disciplinary process.

Records

- A confidential record of each concern, the assessment, investigation, outcome and feedback, kept apart from personnel files.
- Summaries for the owner or board, without names.

Related documents

- Code of conduct
- Grievance procedure
- Fraud and bribery policy
- Corrective and preventive action procedure

Revision history

Version	Date	What changed	Approved by