

# Alzheimer's Society

## Whistleblowing Policy

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Policy and procedure apply to:		Employees: All	
		Contractors: All	Other: non defined
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### 1 About this policy

At Alzheimer's Society, we are committed to achieving the highest standards of honesty, integrity, transparency and accountability. Any suspected wrongdoing should be reported as soon as possible. This policy does not form part of any staff member's contract of employment, and we may amend it at any time.

The purpose of this policy is to:

- (a) Encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- (b) Provide staff with guidance as to how to raise those concerns.
- (c) Reassure staff that they should be able to raise genuine concerns without fear or reprisals, even if they turn out to be mistaken.

### 2 Who does this policy apply to?

This policy applies to all employees including agency workers and interns.

Volunteers do not fall within the legal definition of the term 'worker' and are therefore not captured within this policy. However, we are committed to achieving the highest standards of probity. Volunteers are asked to raise their concerns through the Volunteer Resolving Concerns Guidance or with their Volunteer Role Manager.

### 3 Who is responsible for this policy?

The Board of Trustees has overall responsibility for the effective operation of this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Whistleblowing Officer has day-to-day operational responsibility for this policy, and you should refer any questions about this policy to them in the first instance.

This policy is reviewed at least every other year by the Whistleblowing Officer.

All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected wrongdoing.

## 4 What is whistleblowing?

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

- (a) A criminal offence
- (b) Breach of any legal obligation
- (c) Miscarriage of justice
- (d) Danger to the health and safety of any individual
- (e) Danger to the environment
- (f) The deliberate concealing of information about any of the above.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities, you should report it under this policy.

This policy is used solely for reporting serious wrongdoing; other policies exist if you have a work-related grievance or a complaint or a safeguarding concern. Contact your manager, or People Business Partner, if you are unsure which policy to use.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officer whose contact details are at the end of this policy.

## 5 Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your manager or People Business Partner. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious, or you feel that your manager or People Business Partner has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following people through our new [SpeakUp](#) portal.

You should start with the individual listed first:

1. Whistleblowing Officer (this is the Company Secretary). In their absence or if there is a conflict of interest (for example, your concern is about the Whistleblowing Officer) instead contact:
2. CEO.
3. Where both of those individuals are unavailable or they have conflicts of interest, you should instead contact the Chair of the People and Remuneration Committee, who is a Trustee. This option should **only** be used where the Whistleblowing Officer and Company Secretary are both unavailable, or have conflicts of interest.

We suggest that you include in your report as much information as possible including:

- The date and time the event(s) took place.
- Where it took place.
- The individuals involved and their roles.
- The nature of the concern and what wrongdoing you suspect or know has been done.
- Your contact details.

## 6 Confidentiality

You can report a concern anonymously. However, completely anonymous disclosures are difficult to investigate. Although we will review any report made anonymously, we encourage you to put your name against any concern you raise. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in the investigation of your concern.

## 7 Investigation and Outcome

### Initial Assessment

Once you have reported your concern, an initial assessment will be undertaken by the Whistleblowing Officer to determine the scope of any investigation. During this stage, you may be asked to provide further information or clarification to help the initial assessment. You will be informed of the outcome of the initial assessment, where possible.

The Whistleblowing Officer will carry out an initial assessment to determine whether the matter falls within the scope of whistleblowing and the next steps. The outcome will be one of the following:

1. Concern does not meet the criteria to be dealt with under the Whistleblowing Policy. Matter concludes. Or,
2. Concern does not meet the criteria to be dealt with under the Whistleblowing Policy but requires follow up via another Society policy (e.g., Grievance Policy). Or,
3. Concern meets the criteria and requires further investigation under the Whistleblowing Policy.

### Investigation

If the matter progresses to a whistleblowing investigation, the Whistleblowing Officer will call a meeting of the whistleblowing investigation group. This is a small group of senior staff who do not have any conflicts of interest with the matter being investigated. The investigation group will appoint an investigating officer to undertake the investigation. The investigating officer will be someone with relevant experience of investigations or specialist knowledge of the subject matter. The investigating officer will report their findings to the investigation group and may make recommendations for change.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome, or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

You might be required to attend a meeting as part of the investigatory process. If so, you have the

right to be accompanied by a colleague, or representative of your choice, although they cannot act in a legal capacity or be connected to the concern. The companion must respect the confidentiality of the investigation. The investigator will record a written summary of the concern and provide you with a copy after the meeting.

The person you have raised a concern about may be informed at an early stage, provided with the evidence and allowed to respond. However, there may be instances when it is necessary to conduct the investigation in confidence.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

### **Outcome of the investigation**

Where possible we will inform you of the outcome of the whistleblowing investigation unless there are legal or confidentiality constraints which prevent us from informing you.

The consequences of committing activity that leads to a whistleblowing investigation are serious. If the investigation finds grounds that wrongdoing has occurred, any of the following activities might take place:

- A recommendation might be made to the Board of Trustees that the matter should be reported to the Charity Commission as a Serious Incident.
- Formal disciplinary proceedings might be taken against any Society people (led by the People Directorate).
- The matter might be referred to the Police.
- Every effort will be made to recover assets taken from the Society through Police action or civil litigation. Every possible legal action for the recovery of losses incurred will be considered.
- The Society might review any relevant controls and processes.

## **8 External Disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential hotline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a supplier. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first, in line with this policy. You should contact your manager or People Business Partner or the Whistleblowing Officer for guidance.

## 9 Protection and Support for Whistleblowers

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officer or your People Business Partner immediately.

Whistleblowers must not suffer from threats or retaliation. If this occurs, the perpetrator may be subject to disciplinary action. In some cases, the whistleblower would have a right to sue the individually personally for compensation in an employment tribunal.

## 10 Reporting

Once a whistleblowing report has been received, the Whistleblowing Officer will (subject to any conflicts) notify the Chief Executive, Chair of the Audit and Risk Committee and Chair of the Board that a disclosure has received. Where the matter concerns health and safety or safeguarding, the Lead Health and Safety Trustee or Lead Safeguarding Trustee (as relevant) shall be informed.

If there are conflicts present for any of the above individuals, that individual shall be removed from the notification and the Chair of the Board notified of the conflict. If the Chair of the Board has the conflict, the Vice-Chair will be informed.

The Whistleblowing Officer shall ensure the Chief Executive, Chair of the Audit and Risk Committee and Chair of the Board are informed of the progress and outcome of the matter, at timely intervals.

A summary of the recommendations and findings (for confidentiality purposes) shall be reported to the next Audit and Risk Committee and next Board of Trustees meeting.

## 11 Contacts

Whistleblowing disclosures should be made to one of the following individuals. Ordinarily it

1.	Whistleblowing Officer	<a href="mailto:Roma.Grant@alzheimers.org.uk">Roma.Grant@alzheimers.org.uk</a> Company Secretary
2.	Alternative whistleblowing officer (if the whistleblowing officer is unavailable or conflicted)	<a href="mailto:Corinne.Mills@alzheimers.org.uk">Corinne.Mills@alzheimers.org.uk</a> CEO
3.	Alternative whistleblowing officer (if both individuals above are conflicted)	Chair of the People and Remuneration Committee <a href="mailto:Caroline.fawcett@alzheimers.org.uk">Caroline.fawcett@alzheimers.org.uk</a>

We are currently in the process of identifying an external confidential provider who you may raise concerns with. Once we have this in place, we will include their details in this policy.

**Other useful links**

**Protect** (independent whistleblowing charity that has a list of external have a list of external prescribed regulators for reporting certain types of concern):

Helpline: 020 3117 2520  
Website: [www.protect-advice.org.uk](http://www.protect-advice.org.uk)

**Wellbeing and Support**

Our Arena page:  
<https://alzheimerssociety.sharepoint.com/sites/PeopleandOrganisationalDevelopmentPOD/SitePages/wellbeing.aspx>

Thrive app: <https://download.thrive.uk.com/go-thrive/>

**For volunteers:**  
[Volunteer Resolving Concerns Guidance](#)

**12 Supporting Documents**

- Counter Fraud, Anti-Corruption and Bribery Policy
- Gifts and Hospitality Policy
- [Volunteer Resolving Concerns Guidance](#)
- [Serious Incident Policy](#)
- [Grievance Policy](#)
- [Conflict of Interest Policy](#)

**13 Document details**

Author/Owner:	Roma Grant, Company Secretary
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