



SOUTH EASTERN TRUST

Title:	Raising a Concern in the Public Interest (Whistleblowing) Policy		
Author(s)	Regional Task & Finish Group led by Department of Health Martin O’Toole, Assistant Director Employee Relations, SET representative		
Ownership:	South Eastern Trust		
Approval by:	Adopted from DOH Framework and Policy	Approval date:	May 2024
Operational Date:	June 2025	Next Review:	May 2027
Version No.	4.1	Supersedes	SETHR032018- Your Right to Raise a Concern (Whistleblowing) Policy
Key words:	Whistleblowing; Raising Concerns; Public Interest		
Links to other policies	SET Grievance Policy SET Conflict Bullying and Harassment Policy SET Fraud Policy SET Complaints Policy		

INDEX

1	INTRODUCTION
2	AIMS AND OBJECTIVES
3	SCOPE
4	SUSPECTED FRAUD
5	TRUST'S COMMITMENT TO YOU
6	RAISING A CONCERN
7	RAISIG A CONCERN EXTERNALLY
8	SOCIAL MEDIA
9	CONCLUSION
10	APPENDICES
11	EQUALITY, HUMAN RIGHTS & DDA
12	PERSONAL & PUBLIC INVOLVEMENT (PPI) / CONSULTATION PROCESS
13	ALTERNATIVE FORMATS
14	SOURCES OF ADVICE IN RELATION TO THIS DOCUMENT
15	POLICY SIGN OFF
	APPENDIX A – TRUST ROLES AND RESPONSIBILITIES
	APPENDIX B – PROCEDURE FOR RAISING A CONCERN
	APPENDIX C – ADVICE FOR MANAGERS RESPONDING TO A CONCERN
	APPENDIX D – RAISING CONCERNS IN THE PUBLIC INTEREST & WHISTLEBLOWING PROCESS

1.0 INTRODUCTION

All of us at one time or another may have concerns about what is happening at work. The South Eastern Health and Social Care Trust, (hereafter referred to as the Trust) wants you to feel able to raise your concerns in the public interest with your managers at any time. We expect our managers to listen to those concerns, take them seriously and take action to resolve the concern, either through providing information which gives assurance or taking action to resolve the concern. However, when a concern raised in the public interest appears to be potentially serious because it is about a possible danger, professional misconduct or financial malpractice, illegality or wrongdoing that might affect patients, colleagues, or the Trust itself, it can be difficult to know what to do.

The Trust recognises that many issues are raised by staff and addressed immediately by line managers – this is very much encouraged. This policy and procedure are aimed at those issues and concerns raised in the public interest which **remain unresolved, require help to get resolved or are about serious underlying concerns.**

Raising concerns in the public interest refers to staff reporting suspected wrongdoing at work, for example, concerns about patient safety, health and safety at work, environmental damage or a criminal offence, such as, fraud.

You may be worried about raising such issues in the public interest and may think it best to keep it to yourself, perhaps feeling it is none of your business or that it is only a suspicion. You may also feel that raising the matter would be disloyal to colleagues, to managers or to the organisation. It may also be the case that you have said something but found that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next. Remember that if you are a healthcare professional you may have a professional duty to report a concern. **If in doubt, please raise it.**

Rather than wait for proof, raise the matter when it is still a concern. If something is troubling you which you think we should know about or look into,

please let us know. The Trust has implemented these raising concerns in the public interest arrangements for you to raise any concern in the public interest where the interests of others or the organisation itself are affected or are at risk.

2.0 AIMS AND OBJECTIVES

The Trust is committed to running the organisation in the best way possible. The aim of this policy is to promote a culture of openness, transparency and learning in line with the HSC shared values which at the same time:

- reassures you that it is safe and acceptable to speak up;
- upholds patient confidentiality;
- contributes towards improving services provided by the Trust;
- assists in the prevention of fraud and mismanagement;
- demonstrates to all staff and the public that the Trust is ensuring its affairs are carried out ethically, honestly and to high standards;
- provides an effective and confidential process by which you can raise concerns in the public interest so that patients, clients and the public can be safeguarded.

The Trust roles and responsibilities in the implementation of this policy are set out at **Appendix A**.

3.0 SCOPE

The Trust recognises that existing policies and procedures (Disciplinary, Grievance, Conflict, Bullying and Harassment, the Complaints Procedure and the Accident/Incident Reporting Procedure) may not always be appropriate for concerns raised in the public interest.

This policy provides a procedure for raising concerns in the public interest where the interests of others or of the organisation itself are at risk.

It applies to the following groups:

- staff of the South Eastern Trust, including permanent, temporary and bank staff;
- staff in training/placements working within the South Eastern Trust;
- independent contractors engaged to provide services;
- volunteers;
- agency staff;
- Members of the public.

Examples may include:

- malpractice or ill treatment of a patient or client by a member of staff;
- where a potential criminal offence has been committed, is being committed or is likely to be committed;
- suspected theft or fraud;
- breach of Standing Financial Instructions;
- disregard for legislation, particularly in relation to Health and Safety at Work;
- the environment has been, or is likely to be, damaged;
- failing to declare a conflict of interest;
- a miscarriage of justice has occurred, is occurring, or is likely to occur;
- showing undue favour over a contractual matter or to a job applicant;
- research misconduct; or
- information on any of the above has been, is being, or is likely to be concealed.

This list is not intended to be exhaustive or restrictive

If you feel that something is of concern, and that it is something which you think is in the public interest that *the South Eastern Trust* should know about or look into, you should use this procedure. If, however, you wish to make a complaint about your employment or how you personally have been treated, you should follow the South Eastern Trust's grievance procedure or Conflict, Bullying and Harassment policy for making a complaint about Bullying and/or Harassment. This policy complements professional and ethical rules,

guidelines and codes of conduct. It is not intended to replace professional codes and mechanisms which allow questions about professional competence to be raised. (However, such issues can be raised under this process if no other more appropriate avenue is apparent).

4.0 SUSPECTED FRAUD

If your concern is about possible fraud or bribery the South Eastern Trust has a number of avenues available to report your concern. These are included in more detail in the South Eastern Trust's Fraud Policy, Fraud Response Plan and Anti-Bribery Policy and are summarised below.

Suspicious of fraud or bribery should initially be raised with the appropriate line manager but where you do not feel this is not appropriate the following officers may be contacted:

- Senior Manager
- Head of Department
- Director of Finance and Estates
- Fraud Liaison Officer (FLO)

Employees can also contact the regional HSC fraud reporting hotline on **0800 096 33 96** or report their suspicions online to www.repporthhealthfraud.hscni.net These avenues are managed by BSO Counter Fraud and Probity Services (CFPS) on behalf of the HSC and reports can be made on a confidential basis.

The South Eastern Trust's Fraud Response Plan will be instigated immediately on receipt of any reports of a suspicion of fraud or bribery.

The prevention, detection and reporting of fraud and bribery and other forms of corruption are the responsibility of all those working for the South Eastern Trust or under its control. The South Eastern Trust expects all staff and third parties to perform their duties impartially, honestly, and with the highest integrity.

5.0 THE TRUST'S COMMITMENT TO YOU

5.1 Your safety

The South Eastern Trust, Board, the Chief Executive, managers and the trade unions/professional organisations are committed to this policy. If you raise a concern in the public interest under this policy, you will not be at risk of losing your job or suffering any detriment (such as a reprisal or victimisation). The South Eastern Trust will not tolerate the harassment or victimisation of anyone who raises a concern in the public interest.

The South Eastern Trust expects you to raise concerns about malpractices. If any action is taken that deters anyone from raising a concern in the public interest or victimises them, this will be viewed as a disciplinary matter.

Provided you raise a concern in the public interest and with a reasonable belief in its truth, it does not matter if it turns out that you are mistaken or if there is an innocent explanation for your concerns, you will be protected under the law. If staff raise a matter they know to be untrue, protection under the law cannot be guaranteed and the Trust reserves the right to take disciplinary action if appropriate.

5.2 Confidentiality

With these assurances, the Trust hopes that you will raise concerns openly in the public interest. However, we recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, you should say so at the outset.

Where possible, the Trust is committed to maintaining confidentiality for everyone involved in a concern. This includes the person raising the concern and the person(s) whom the concern is about. As far as possible, confidentiality will be maintained throughout the process and after the issue has been resolved.

If you ask for your identity not to be disclosed, we will not do so without your consent unless required by law. You should however understand that there may be times when we will be unable to resolve a concern without revealing your identity, for example, where your personal evidence is essential. In such cases, we will discuss with you whether and how the matter can best proceed.

5.3 Anonymity

Remember that if you do not disclose your identity, it will be much more difficult for us to look into the matter. It will also not be possible to protect your position or give you feedback. Further, without additional evidence, it may be difficult to investigate such complaints properly in order to establish the facts. So, while we will consider anonymous reports in a similar manner as those which are not anonymised, these arrangements are not best suited to deal with concerns raised anonymously.

6.0 RAISING A CONCERN

If you are unsure about raising a concern in the public interest, you can get independent advice at any stage from your trade union/professional organisation, or from one of the listed organisations accessed via the link in Section 7. You should also remember that you do not need to have firm evidence before raising a concern in the public interest, only a reasonable belief that an act of wrongdoing has occurred or that there has been a deliberate attempt to cover up a wrongdoing. However, you should explain as fully as possible the information or circumstances that gave rise to the concern. If you remain unsure about raising a concern in the public interest, you can get independent advice from Protect (see contact details under Independent Advice).

6.1 Who should I raise a concern with?

In many circumstances the easiest way to get your concern resolved will be to raise it with your line manager (or lead clinician or tutor). Where you do not

think it is appropriate or it has failed to resolve the matters satisfactorily you can contact one of the following people:

- the raising concerns in the public interest advocate (refer to Raising Concerns [quick link](#) on iconnect)
- raising concerns helpline 028 9263 3700 or email raising.concerns@setrust.hscni.net
- A more Senior Manager.

If you still remain concerned after this, you can contact:

- the Director of People and Organisational Development who has responsibility for raising concerns in the public interest:
Mrs Claire Smyth - claire.smyth4@setrust.hscni.net; tel: 028 9044 3145

All these people have been trained in receiving and identifying how best to respond to concerns in the public interest and will give you information about where you can go for more support.

If for any reason you do not feel comfortable raising your concern internally, you can raise concerns with external bodies (see paragraph 7 below).

If exceptionally, the concern is about the Chief Executive, then it should be made (in the first instance) to the Chair, who will decide on how the concern raised should progress.

6.2 Independent advice

If you are unsure whether to use this policy, or if you require confidential advice at any stage, you may contact your trade union/professional organisation.

Advice is also available through the independent charity (Protect) on 020 3117 2520. www.protect-advice.org.uk

6.3 How should I raise my concern?

You can raise your concerns in the public interest with any of the people listed above, in person, by phone or in writing (including email).

Whichever route you choose, please be ready to explain as fully as you can the information and circumstances that gave rise to your concerns.

7.0 RAISING A CONCERN EXTERNALLY

The Trust hopes this policy reassures you of its commitment to have concerns raised in the public interest under the policy taken seriously and where appropriate and/or necessary fully investigated, and to protect an individual who raises such concerns in the public interest.

Whilst there may be occasions where individuals will wish to report their concerns to external agencies or the PSNI, the Trust would hope that the robust implementation of this policy will reassure staff that they can raise such concerns internally in the first instance.

However, the Trust recognises that there may be circumstances where you can raise a concern in the public interest with an outside body as specified in the following schedule to The Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014 at <https://www.legislation.gov.uk/nisr/2014/48/schedule/made> for a full list of contacts.

Disclosure to these organisations/persons will be protected provided you honestly and reasonably believe the information and associated allegations are substantially true.

We would wish you to raise a matter with the external agencies listed above than not at all. Protect (or your trade union) will be able to advise you on such

an option and on the circumstances in which you may be able to contact an outside body safely.

8.0 THE MEDIA

You may consider going to the media in respect of your concerns if you feel the Trust has not properly addressed them. You should carefully consider any information you choose to put into the public domain to ensure that patient/client confidentiality is maintained at all times. The Trust reserves the right to take disciplinary action if patient/client confidentiality is breached.

Communication with the media are coordinated by the Trust's Communications team who will respond on behalf of the Trust. Staff approached by the media should direct the media to this department in the first instance.

9.0 CONCLUSION

While we cannot always guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly, impartially and thoroughly. By using these raising concerns in the public interest arrangements you will help us to achieve this.

Please note, this document has been developed to meet best practice and comply with the Public Interest Disclosure (NI) Order 1998 (as amended) (the Order) which provides employment protection for raising concerns in the public interest.

The Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014 gives significant statutory protection to staff who disclose information reasonably in the public interest. To be protected under the law an employee must act with an honest and reasonable belief that the matters specified in the concern raised occurred, is occurring or is likely to occur. Disclosures may be made to certain prescribed persons or bodies external to

the Trust listed in the Public Interest Disclosure (Prescribed Persons) (Amendment) Order (Northern Ireland) 2014.

10.0 APPENDICES

Appendix A – Roles and Responsibilities

Appendix B – Procedure for Raising a Concern

Appendix C – Advice for Managers

Appendix D – Raising Concerns in the Public Interest & Whistleblowing
Process Flow Chart

11.0 EQUALITY, HUMAN RIGHTS & DDA

This policy has been drawn up and reviewed in the light of Section 75 of the Northern Ireland Act (1998) which requires the Trust to have due regard to the need to promote equality of opportunity. It has been screened to identify any adverse impact on the 9 equality categories.

The policy has been **screened out** without mitigation or an alternative policy proposed to be adopted.

12.0 PERSONAL & PUBLIC INVOLVEMENT (PPI)/Consultation Process

Regional Task and Finish Group including Department of Health and Trade Unions

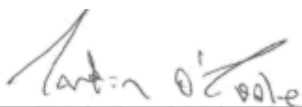

13.0 ALTERNATIVE FORMATS

This document can be made available on request on disc, larger font, Braille, audio-cassette and in other minority languages to meet the needs of those who are not fluent in English.

14.0 SOURCES OF ADVICE IN RELATION TO THIS DOCUMENT

The Policy Author, responsible Assistant Director or Director as detailed on the policy title page should be contacted with regard to any queries on the content of this policy.

15.0 POLICY SIGN OFF

 _____	Date <u>19.06.2024</u>
Lead Policy Author	
 _____	Date <u>19.06.2024</u>
Director of People and OD	

ROLES AND RESPONSIBILITIES

The role of the South Eastern Trust Board (including the designated Non-Executive Director (NED)):

- To have responsibility for oversight of the culture of raising concerns in the public interest within their organisation in accordance with the HSC Board Member Handbook (sections 4.12)¹.

The South Eastern Trust:

- To listen to our staff, learn lessons and strive to improve patient care;
- To ensure that this policy enables concerns raised in the public interest to be dealt with effectively;
- To promote a culture of openness and honesty and ensure that issues are dealt with responsibly and taken seriously;
- To ensure that employees who raise concerns in the public interest do not suffer any detriment for doing so unless other circumstances come to light which require this, e.g., where a member of staff knowingly raises an issue regarding another member of staff which they know to be untrue; and
- To share learning, as appropriate, via our shared learning procedures.

The Responsible/designated Senior Manager/s:

- To take responsibility for ensuring the implementation of the raising concerns in the public interest arrangements.

Managers:

- To take any concerns raised with them in the public interest seriously and consider them fully and fairly and respond appropriately taking any necessary and appropriate action;
- To recognise that raising a concern in the public interest can be a difficult experience for some staff and to treat the matter in a sensitive manner if required;

¹ <https://www.health-ni.gov.uk/publications/hsc-board-member-handbook>

- To seek advice from other professionals within the Trust where appropriate;
- To invoke the formal procedure and ensure the Director of People and Organisational Development is informed, if the issue is appropriate; and
- To ensure feedback/ learning at individual, team and organisational level on concerns raised in the public interest and how they were resolved.

Raising concerns in the public interest advocate:

- To ensure that any safety issue about which a concern has been raised is dealt in accordance with the procedures promptly and escalated appropriately through all management levels;
- To intervene and, if appropriate, escalate if there are any indications that the person who raised a concern in the public interest is suffering any detriment; and
- To work with managers and HR to address the culture in an organisation and tackle any obstacles to raising concerns in the public interest.

All Members of Staff:

- To recognise that it is your duty to draw to the Trust's attention any matter of concern in the public interest;
- To adhere to the procedures set out in this policy; and
- Where possible, to maintain the duty of confidentiality to patients and the Trust and consequently, where any disclosure of confidential information is to be justified, you should first, where appropriate, seek specialist advice for example from a representative of a regulating organisation such as the Nursing & Midwifery Council or the General Medical / Dental Council.

Role of Trade Unions and other Organisations:

All staff have the right to consult and seek guidance and support from their Professional Organisations, Trade Union or from statutory bodies such as the Nursing & Midwifery Council, the General Medical Council, Health Professional Council and the Northern Ireland Social Care Council.

PROCEDURE FOR RAISING A CONCERN

Note that if a concern raised in the public interest is adjudged to be serious in nature the receiving manager should escalate that concern to a senior manager for investigation. This essentially allows for a manager to escalate a concern to the formal stage where it will be formally recorded on the Trust register.

Informal - Manager

If you have an honest and reasonable belief that a concern which is in the public interest about malpractice, risk, abuse or wrongdoing has occurred, is occurring, or is likely to occur, then the matter should be raised informally in the first instance with your Line Manager (lead clinician or tutor). This may be done verbally or in writing.

You are entitled to support from a trade union/ fellow worker or companion to assist you in raising your concern in the public interest.

Informal – Alternative to Manager

If you feel unable to raise the matter with your Line Manager (lead clinician or tutor), for whatever reason, please raise the matter with our raising concerns in the public interest advocate or a more senior manager from the organisation. (Refer to Raising Concerns [quick link](#) on iconnect)

This person has been given special responsibility and training in dealing with concerns raised in the public interest. They will:

- (where possible) treat your concern confidentially unless otherwise agreed;
- ensure you receive timely advice on how best to progress your concerns;
- escalate to the appropriate authority any indications that you are being subjected to detriment for raising your concern in the public interest;
- remind the organisation of the need to give you timely feedback on how your concern is being dealt with;
- ensure you have access to personal support through, for example, your employee assistance programme (e.g., Inspire etc.) since raising your concern in the public interest may be stressful.

Whilst it would be the preference of the Trust for you to raise the matter openly, if you want the matter dealt with in confidence, please say so at the outset so that appropriate arrangements can be made.

Formal

If these channels have been followed and you still have concerns or your concerns remain unresolved, or if you feel that the matter is so serious that you cannot discuss it with any of the above through the informal process, please contact:

Roisin Coulter – Chief Executive - Roisin.Coulter@setrust.hscni.net

Please also refer to Appendix D Flow Chart.

Screening

The Trust will undertake a screening process for any formally raised concern. This process will determine the most appropriate route/s and process/es for all or parts of your concern.

Prescribed Bodies (or media)

You can raise your concerns in the public interest formally with the prescribed external bodies listed in the link at paragraph 7 or to the media – note that you don't have to exhaust either of the above stages if you decide to go straight to the prescribed bodies or media – see also at a glance section above:

- If you choose to bypass the routes available for you to make a disclosure (directly to the Trust or via outside organisations referred to in the legislation) and instead approach the media with your concerns, it is likely you will lose your right to protection under Whistleblowing legislation. The exception to this is a case where the wrongdoing is exceptionally serious and where you reasonably believe that the Trust will subject you to 'detriment' or conceal/destroy evidence if you were to raise your concerns via the routes available to you.

What will we do?

We are committed to listening to our staff, learning lessons and improving patient care. On receipt, the concern will be recorded and, where possible, you will receive an acknowledgement within three working days.

A central register will record the date the concern was received, whether you have requested confidentiality, a summary of the concerns and dates when updates and feedback have been provided. While your identity may be included within the allegation or report, the register will not include any information which may identify you, nor should it include any information which may identify an individual or individuals against whom an allegation is made.

Investigation

Where you have been unable to resolve the matter quickly (usually within a few days) with your Line Manager, or if the matters raised are serious in nature we will carry out a proportionate investigation – using someone suitably independent and trained – and we will reach a conclusion within a reasonable timescale (which we will notify you of).

Wherever possible we will carry out a single investigation (so, for example, where a concern is raised about a patient safety incident, we will usually undertake a single investigation e.g., a Serious Adverse Incident (SAI) investigation that looks at your concern and the wider circumstances of the incident). The investigation will be objective and evidence-based and will produce a report that focuses on identifying and rectifying any issues and learning lessons to prevent problems recurring.

We may decide that your concern would be better looked at under another process: for example, the Conflict, Bullying and Harassment process.

We will advise you, where possible, and those identified as the subject of a concern, of the process, what will be investigated and what will not, those who will be involved, the roles they will play and the anticipated timescales.

Any employment issues (that affect only you and not others) identified during the investigation will be considered separately.

Where an Agency worker raises a concern then it is the responsibility of the Trust to follow the process as above.

For the purposes of recording, if the concern is already, or has previously been, the subject of an investigation under another procedure it will not be appropriate to categorise it under the Trust's Raising Concerns in the Public Interest Policy.

Communicating with you

We welcome the raising of concerns in the public interest and will treat you with respect at all times. We will discuss your concerns with you to ensure we understand exactly what you are worried about. In the event that an investigation is required, we will endeavour to provide a response within 12 weeks of the concern being received. We will provide an update on progress by week 6 and again by week 10 of the investigation. In so far as it is appropriate, we will provide feedback to the person who raised the concern including the outcome of the investigation and any corrective action. A meeting with the person who raised the concern will be offered in the first instance or where this is not possible a written summary will be sent.

How we will learn from your concerns

The focus of the investigation will be on improving our services. Where it identifies improvements that can be made, we will track them to ensure necessary changes are made and are working effectively. The final outcome and 'lessons learned' will be documented and approved as final by the responsible Director. In addition, the relevant professional Executive Director will independently assess the findings and recommendations for assurance that the matter has been robustly considered and appropriately addressed.

Board oversight

The Trust Board and the Department of Health will be given high level information about all concerns raised in the public interest by our staff and others through this policy and what we are doing to address any problems. We will include similar high-

level information in our annual report. The organisation's board supports staff and others raising concerns in the public interest and want you to feel free to speak up. The Chair has nominated a non-executive director (NED) with responsibility for the oversight of the organisation's culture of raising concerns in the public interest.

The South Eastern Trust NED responsible for Raising Concerns is:

Kevin McMahon - kevin.mcmahon@setrust.hscni.net

Review & Reporting

We will provide regular reports to senior management and to our HSC's Designated Committee within the Assurance Framework on our raising concerns in the public interest caseload and an annual return to the Department of Health setting out the actions and outcomes.

This policy has been reviewed against the NI Audit Office – Raising Concerns – A good practice guide for Northern Ireland Public Sector.

ADVICE FOR MANAGERS RESPONDING TO A CONCERN

1. Managers should maintain an understanding of the process for raising a concern in the public interest;
2. Seek advice from the Trust lead on raising concerns in the public interest if in doubt at any stage;
3. Thank the staff member for raising the concern, even if they may appear to be mistaken;
4. If appropriate refer the member of staff to other independent sources of advice and guidance on raising concerns in the public interest;
5. Respect and heed legitimate staff concerns about their own position or career;
6. Manage expectations and respect promises of confidentiality;
7. Discuss reasonable timeframes for feedback with the member of staff;
8. Remember there are different perspectives to every story;
9. Determine whether there are grounds for concern and investigate if necessary as soon as possible. Where appropriate alert those identified as the subject of the concern. If the concern is potentially very serious or wide-reaching, consider who should handle the investigation and know when to ask for help. If asked, managers should put their response in writing;
10. The Trust should ensure that the investigator is not connected to the concern raised and determine if there is any actual, potential or perceived conflict of interest which exists prior to disclosing full details of the concern. Should a conflict of interest arise at any time during the investigation the investigator must alert the manager as quickly as possible. (Note: Any such conflict must be considered, and acted on, by the manager);
11. Managers should bear in mind that they may have to explain how they have handled the concern;
12. Feed back to the person who raised the concern and those identified as the subject of a concern (where appropriate) any outcome and/or proposed remedial action, but be careful if this could infringe any rights or duties which may be owed to other parties;

13. Consider reporting to the organisation's board and/or an appropriate regulator (if appropriate) the outcome of any concern raised in the public interest where malpractice or a serious safety risk was identified and addressed; and
14. Record-keeping - it is prudent to keep a record of any concerns raised formally with those designated under the policy, and these records should be anonymous where necessary. Managers should record any concerns raised informally and document action taken to resolve matters.

RAISING CONCERNS IN THE PUBLIC INTEREST & WHISTLEBLOWING PROCESS

