

ALONE Whistleblowing Procedure

1. Purpose

All employees are encouraged to raise genuine concerns about possible improprieties in the conduct of the ALONE's business, whether in matters of financial reporting or other malpractices, at the earliest opportunity and in an appropriate way. A concern which is not reported may allow continued inappropriate treatment of the Older People we work with, further monies to be wasted or fraud to be perpetuated causing a reduction in the resources available for Older People's services. ALONE applauds employees who courageously raise genuine concerns. Mischievous reporting will be taken very seriously and perpetrators will be disciplined appropriately.

This procedure is designed to:

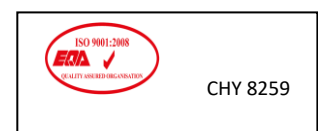
- Support ALONE's values and ethos
- Ensure employees can raise concerns without fear of suffering retribution.
- Provide a transparent and confidential process for dealing with concerns.

2. Scope

This procedure covers:

- Endangerment of the health and safety of Older People, including concerns about elder abuse
- Endangerment of the health and safety of employees
- Possible improprieties in matters of financial reporting
- Fraud
- Waste
- Corruption, bribery or blackmail
- Criminal offences
- Failure to comply with a legal or regulatory obligation
- Miscarriage of justice
- Breaches of ALONE's policies or QMS procedures relating to the business of ALONE
- Concealment of any of the above

'ALONE's Whistleblowing Procedure, GOV013, Rev 004'
Issued by Anne Murphy, 26/7/16
Approved by Sean Moynihan, 21/7/16
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Personal or employment contract-related grievances should be dealt with directly with line management or the Human Resources department, as detailed in the ALONE Staff handbook.

3. Responsibility

All staff and volunteers have a responsibility to report genuine concerns. There exists no minimum length of employment to make a disclosure: an employee of ALONE is protected for making a protected disclosure from 'day one' of their employment.

In return, ALONE promises to:

- Applaud those who raise genuine concerns.
- Treat all concerns fairly and properly.
- Ensure that any individual raising a concern is aware of who is handling the matter.
- Ensure that a person who is mistaken in raising a concern will not suffer any form of retribution as a result of raising that concern. However this assurance will not apply to someone who maliciously raises a matter that he/she knows is untrue.

ALONE's CEO, management team and board are responsible for responding to and appropriately managing any concerns that are raised.

4. Related documents and Policies

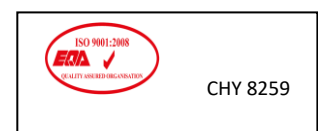
- Accident and Incident Procedure
- ALONE staff handbook
- HSE & ALONE Vulnerable adult policies
- ALONE Child Protection Procedure
- ALONE complaints procedure

5. Procedure

Issues / Concerns around Older People:

All serious concerns relating to an Older Person should be recorded by the concerned ALONE staff member, on the Older Person's page in CRM, using the accidents and incidents option. The staff member should report the concern and forward the hyperlink to the accident and incident to their Manager and to ALONE's Quality Manager.

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The Manager is responsible for reviewing the issue raised and ensuring that all appropriate actions are followed. The manager will also keep the Quality Manager informed about the issues and resolution. The Manager and Quality Manager will meet to discuss the outcome and to consider any other changes required, including changes to Risk Management system, to prevent the reoccurrence of similar issues and to minimize risk.

If the staff member believes that they cannot or should not report their concerns about an Older Person to their manager, they must report their concern to ALONE’s Quality Manager or ALONE’s CEO. If an employee does not wish to be identified, they can report their concerns anonymously (through an unsigned letter) to either the Quality Manager or the CEO.

The Quality Manager and or CEO are responsible for reviewing the issue raised and ensuring that all appropriate actions are followed. The Quality Manager and CEO will meet with the service manager as appropriate to discuss the issue, outcomes and to consider any other changes required, including changes to Risk Management system, to prevent the reoccurrence of similar issues and to minimize risk.

All other Issues/Concerns

If any employee believes reasonably and in good faith that practice, as described in section 1, exists in the work place, then they should report this to the Quality Manager, the CEO or to a member of ALONE’s Board of Trustees.

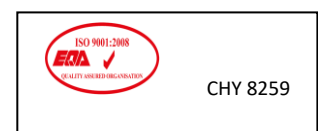
If an employee does not wish to be identified, they can report their concerns anonymously (through an unsigned letter) to any of the people mentioned above.

All issues brought to the attention of the Quality Manager or the CEO will be reviewed by them and all appropriate actions will be taken. When necessary, the Quality Manager or CEO will report a concern directly to a member of ALONE’s Board of trustees.

When the Quality Manager or CEO reports a concern directly to a Board member, the Quality Manager or CEO will meet with the Board member to investigate the issues and all appropriate actions will be taken, including changes to Risk Management system, to prevent the reoccurrence of similar issues and to minimize risk.

Where the issue/concern has been reported directly to a Board member, the Board member will investigate the issue, all necessary follow-up actions and required changes

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will be managed by the Board member with the support of the Board and appropriate ALONE staff members.

All issues/concerns will be considered in relation to ALONE’s Risk Management system, to prevent the reoccurrence of similar issues and to minimize risk.

Please note:

Employees or volunteers who raise concerns internally will be told who is handling the matter. ALONE will give as much feedback as it can without any infringement on a duty of confidence owed to someone else. This will include the provision of a clear timeframe and details of the steps that may be taken in following up on your report.

In general, employees’ identities will not be disclosed without prior consent. Where concerns cannot be resolved without revealing the identity of the employee raising the concern (e.g., if evidence is required in a court or Tribunal), ALONE will enter into a dialogue with the employee concerned as to whether and how it can proceed. If an employee is unsure whether to use the procedure or he/she wants independent advice at any stage, reasonable support (which may include legal advice) will be provided to the employee.

In terms of gathering evidence on any concerns, please be aware that ALONE will take the lead on investigation. Although you will need to show that you have a ‘reasonable belief’ that possible improprieties in the conduct of the ALONE’s business were/are taking place, you may not need documentary evidence to have such a belief.

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