



	<b>West Limerick Independent Living CLG Policies</b>				
<b>Title:</b>	<b>GOOD FAITH REPORTING POLICY</b>				
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Category: Operational Policies  
Subject: Complaints Reporting Policies  
Responsible for Review of this Policy: West Limerick Independent Living CLG Board

## 1. Foreword

The purpose of this document is to set out the West Limerick Independent Living's policy on Good Faith Reporting.

This Policy is part of a suite of policies and should be read in conjunction with two of the other documents:

- Code of Standards and Behaviour
- Policy on Fraud

The Protected Disclosures of Information - Explanatory Leaflet for Health Employees

This explanatory leaflet sets out the procedure for making a protected disclosure under Section 103 of the Health Act 2007. If an employee reports a workplace concern in good faith and on reasonable grounds in accordance with the procedures outlined in the legislation, it will be treated as a protected disclosure and the employee will not be liable for damages as a consequence of making the protected disclosure. Such disclosures can be made by health service employees (including HSE employees) to the Authorised Person appointed by the HSE by completing and signing a Protected Disclosures of Information form. The Authorised Person will investigate, or arrange to be investigated, any matter disclosed.

## 2. Policy on Good Faith Reporting

All employees are encouraged to raise genuine concerns about possible improprieties in the conduct of the West Limerick Independent Living'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 patients, further monies to be wasted or fraud to be perpetuated causing a reduction in the resources available for patient care. The West Limerick Independent Living applauds employees who courageously raise genuine concerns.

Mischievous reporting will be taken very seriously and perpetrators will be disciplined appropriately.

This policy is designed to:

- support West Limerick Independent Living values;
- ensure employees can raise concerns without fear of suffering retribution; and
- provide a transparent and confidential process for dealing with concerns.

This policy covers:

- Possible improprieties in matters of financial reporting
- Fraud



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- Waste
- Corruption, bribery or blackmail
- Criminal offences
- Failure to comply with a legal or regulatory obligation
- Miscarriage of justice
- Breaches of the Code of Standards and Behaviour or any other Code or policy relating to the business of the West Limerick Independent Living
- Endangerment of the health and safety of employees or patients
- Concealment of any of the above

Personal grievances should be dealt with directly with supervisors or management.

### 3. Principles

- The West Limerick Independent Living applauds employees who raise genuine concerns.
- All concerns raised will be treated fairly and properly.
- The West Limerick Independent Living will ensure that any individual raising a concern is aware of who is handling the matter.
- 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.

### 4. Reporting Procedure

If any employee believes reasonably and in good faith that practice, as described at 2 above, exists in the work place, then he/she should normally report this immediately to his/her own line manager and through the risk and incident reporting systems as appropriate. However, if for any reason the employee is reluctant to do so, then he/she should report these concerns to either the Manager or a West Limerick Independent Living a Board member.

Employees concerned about speaking to another employee can contact:

Leigh Gath  
Confidential Recipient for Vulnerable Persons  
Training Services Centre  
Doodadoyle  
Limerick  
LoCall 1890 100 014  
Mobile 087 6657269  
Email [leigh.gath@crhealth.ie](mailto:leigh.gath@crhealth.ie)

Employee will be advised by the Confidential Recipient for Vulnerable Persons of options (including that of making of a protected disclosure) for reporting any concerns relating to:

Employees who do not wish to make a protected disclosure can make a good faith report. Good faith reports made to the Confidential Recipient for Vulnerable Persons will be referred to the relevant West Limerick Independent Living officer for investigation. The Manager will not disclose the identity of the employee making the good faith report where the employee so instructs (see also final par. below).



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If these channels have been followed and employees still have concerns, or if employees feel the matter is so serious that it cannot be discussed with any of the above, they may choose to make a report directly to an appropriate external regulatory authority without recourse to the procedures for making a report internally.

Employees who have raised concerns internally will be advised of the contact details of the person who is handling the matter and will be able to provide additional assistance if required. West Limerick Independent Living will give as much feedback as it can without any infringement on a duty of confidence owed to someone else.

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), West Limerick Independent Living 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.

## 5. Responsibilities

All Employees	To ensure that Reports are made when appropriate, are valid and are made in good faith.
Line Managers	All Staff Line Managers To investigate and to follow the appropriate steps once a Report is made. (See the HSE Toolkit of Documentation to support Incident Management 2009 for investigation methodology)
Human Resources	To ensure that all employees are informed of the Policy annually.
Manager/ Quality Committee	Ownership of the policy and oversight of its Communication, implementation and periodic review. Where serious allegations occur to inform the full board.

## 6. Service Standards

### 6.1 Service Standards - Quality and Client Safety, Fraud Corruption and Waste

Activity	Service Standard	Who is responsible
Commence initial investigation	Within 10 working days of notification	Line Manager or Manager
Commence full investigation commissioned (if required)	Within 10 working days of the initial investigation *(see below)	Manager (or Line Manager, if appropriate)
Prepare investigation report	Within 10 days of completion of the full investigation	Manager or / Line Manager if appropriate



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Provide formal feedback to Employee making the Report (where possible)	Within 5 days of completion of the full investigation report	Manager (or Line Manager, if appropriate)
Report to Quality Committee	Report to next scheduled meeting, subject to the Quality Committee reserving the right to inform the committee's Chairperson immediately	Chairperson and Board of Directors

\* Timescales for the completion of the full investigation (including deadlines for interim / progress reports, where appropriate) to be no longer that two months.

## 7. REVIEW OF POLICY

This Policy will be reviewed by the board annually.

## 8. EFFECTIVE DATE(S)

This Policy was effective on the 23<sup>rd</sup> January 2017. Last reviewed: Not applicable as first issue.

## 9. SIGNATURE, TITLE AND DATE OF APPROVAL

Approval Signature:

Ben Lenihan  
Chairperson  
West Limerick Independent Living

Date:



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Appendix 1.

HSE Toolkit of Documentation to support Incident Management 2009 for investigation methodology

[http://www.hse.ie/eng/about/Who/qualityandpatientsafety/Local\\_Quality\\_and\\_Patient\\_Safety\\_Offices/QPS\\_DML/toolkit\\_incid\\_mgt\\_2009.pdf](http://www.hse.ie/eng/about/Who/qualityandpatientsafety/Local_Quality_and_Patient_Safety_Offices/QPS_DML/toolkit_incid_mgt_2009.pdf)