



Public Interest Disclosure Policy (for members)

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Introduction

Play Therapy UK (PTUK) is committed to the highest standards of openness, probity, and accountability. An important aspect of accountability and transparency is a mechanism to enable PTUK members to voice concerns in a responsible and effective manner.

This policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial, or business decisions taken by PTUK, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

Public interest disclosure (formerly 'whistleblowing') is when an individual raises, in the public interest, a concern about wrongdoing of a PTUK member. A qualifying disclosure is one made by a person who reasonably suspects that it shows past, present or likely future wrongdoing in one or more of the following (not an exclusive list):

- commission of a criminal offence
- failure to observe a legal obligation, or to comply with an instrument of governance including non-disclosure of a conflict of interest
- miscarriage of justice
- serious threat to health or safety
- damage to the environment
- bribery
- a breach of the Modern Slavery Act 2015 (such as exploitation)
- administrative malpractice (financial or non-financial)
- obstruction or frustration of the exercise of academic freedom
- academic or professional malpractice (including, for instance, violation of intellectual property rights or failure of integrity in research)
- improper conduct or unethical behaviour
- unauthorised disclosure of confidential information
- suppression or concealment of any of the above matters

The person raising the concern must believe that the information they disclose is true and in raising the concern, the individual must not themselves be committing an offence.

The person raising the concern must believe they are acting in the public interest. This means that a number of people stand to benefit if action is taken on the concern, and it is not solely for personal gain. Personal grievances and complaints do not usually fall under the definition of whistleblowing.

A public interest disclosure ('whistleblowing') is the disclosure of information that relates to:

- suspected serious wrongdoing or dangers relating to the running of the organisation or setting in which an employee or volunteer works; or
- the work-related activities of staff and others delivering services in that organisation or setting, whether remunerated or not.

The Public Interest Disclosure Act 1998 (the Act) sets the criteria that must be met for raising concerns in order for them to qualify as whistleblowing.

Protection

The Act gives significant statutory protection to those who disclose information reasonably and responsibly in the public interest and may be victimised as a result. The Act provides protection for people who raise legitimate concerns about specified matters known as 'qualifying disclosures.' This protection applies even if you are mistaken.

Confidentiality

PTUK will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised.
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists in making them, disciplinary action may be taken against that individual.

Procedures for Making a Disclosure

On receipt of a complaint of any wrongdoing against a PTUK member, the procedure outlined in the PTUK Complaints and Concerns Procedure ([Complaints & Concerns Procedures](#)) will be followed.

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