



International Bureau for Epilepsy Whistleblower Policy

Purpose

The International Bureau for Epilepsy (IBE) is committed to high standards of ethical, moral and legal business conduct. This policy aims to provide all staff and volunteers with a channel to raise concerns and reassurance that they will be protected from reprisals or victimisation for whistleblowing.

This whistleblowing policy is intended to cover protections for you if you raise concerns regarding IBE, such as:

- incorrect financial reporting
- unlawful activity
- activities that are not in line with IBE policies
- or other activities, which otherwise amount to serious improper conduct

Safeguards

Harassment or Victimisation: No person who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable Executive Committee members, volunteers, employees and others to raise serious concerns within the Bureau prior to seeking resolution outside of the organisation.

Confidentiality: Violations or suspected violations may be submitted on an anonymous or confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Acting in Good Faith: Anyone filing a complaint concerning a violation or suspected violation of the Code or Conflict of Interest Policy must be acting in good faith and have reasonable grounds for believing this information disclosed indicates a violation of the Bureau's Code or policies. Any allegations that prove not to be substantiated and which prove to have been

made maliciously or knowingly to be false will be viewed as a serious disciplinary offence and may be considered a violation of the Code of Ethics.

Anonymous Allegations: This policy encourages contracted staff and volunteers to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Procedures for Reporting Violations

1. Process for Raising a Concern

Reporting: This Whistleblower procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to any member of the board.

Timing: The earlier a concern is expressed, the easier it is to take action.

Evidence: Although the staff/volunteer is not expected to prove the truth of an allegation, the staff/volunteer should be able to demonstrate to the person contacted that the report is being made in good faith.

2. How the Report of Concern will be Handled

The action taken by IBE in response to a report of concern under this policy will depend on the nature of the concern; the governing board of IBE shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquires: These will be made to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information: The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

Approved by the International Executive Committee (Board of Directors) of the International Bureau for Epilepsy (IBE) on: 25th March 2010 at its meeting in Ghent, Belgium.

Next review of this of Policy is due on: