



Faculty of  
Pharmaceutical  
Medicine

*Advancing the science and practice of pharmaceutical medicine  
for the benefit of the public*

# FPM Fraud and Whistleblowing Policy

[version 3, 2019]

# 1. Purpose

The Faculty of Pharmaceutical Medicine of the Royal Colleges of Physicians of the United Kingdom (FPM) is a registered charity with the mission to advance the science and practice of pharmaceutical medicine by working to develop and maintain competence, ethics and integrity and the highest professional standards in the specialty for the benefit of the public. As such, it has a commitment to high standards of legal and ethical probity and all members of FPM, members of staff, officers and trustees are expected to share this commitment. This policy is established to facilitate the investigation of fraud and related offences, while protecting the interests of those who, acting with integrity and in good faith, bring to light instances of fraud, breaches of trust or other unacceptable behaviour.

## 2. Scope

This policy is primarily concerned with financial fraud (the use of deception to obtain an unjust or illegal financial advantage or intentional misrepresentation affecting FPM's financial statements) but also applies to non-financial fraud (the use of deception with the intent of obtaining advantage, avoiding an obligation or causing loss to another party). It is the attempt to deceive that is considered morally reprehensible, so attempted fraud is treated as seriously as accomplished fraud.

This policy applies to irregularity or suspected irregularity involving employees of FPM as well as members, officers, trustees, volunteers, consultants, contractors, vendors and any other parties with FPM's trust.

The whistleblowing provisions in this policy apply not only to fraud but also to other areas of malpractice such as breaches of FPM policies, poor health and safety or employment practices, forms of abuse such as bullying, or actions by FPM that could harm the environment.

## 3. Policy

The members, officers and most trustees of FPM are medical practitioners and expected to be bound by the principles laid out in the Good Pharmaceutical Medical Practice guidelines. Furthermore, as stewards of a registered charity, trustees, officers, and staff of FPM are expected to demonstrate high standards of honesty, propriety and personal integrity. FPM's Code of Conduct for Trustees requires trustees to observe and promote the Nolan Principles (The Seven Principles of Public Life).

The Trustees of FPM are obliged to ensure the sound financial management of the charity's resources, ensuring expenditure is in line with the organisation's objects, and to ensure the effective and efficient administration of the charity. To this end it has established policies and practices within FPM that serve to reduce the risk of financial loss, including loss through fraud. In addition, there are policies and procedures in place which the Trustees intend to establish and maintain an honest, open and well-intentioned atmosphere within FPM to enable it to effectively fulfil its mission. In this spirit of openness, trustees, officers, volunteers and staff are encouraged to share their questions, concerns, suggestions or complaints since this will help identify weaknesses in FPM's policies and procedures that might expose FPM to fraud.

All these factors will diminish the risk of FPM being exposed to fraud; nevertheless, FPM is committed to the elimination of any fraud within the organisation and to the rigorous investigation of any such cases.

The Board of Trustees wishes to encourage anyone having reasonable suspicions of fraud to report them, therefore it is the Board's policy that trustees, officers, volunteers and staff will not suffer in any way because of reporting reasonably held suspicions according to this policy. For these purposes 'reasonably held suspicions' shall mean any suspicions other than those which are shown to be raised both maliciously and without foundation.

Any suspicions of fraud or other malpractice, or breaches of FPM's policies and procedures, should be reported as a matter of urgency to the Chief Executive in the first instance. If for any reason this would not be appropriate, then they should be reported to the appropriate Officer, any trustee, or the President. Every effort will be made to protect the reporter's anonymity, if requested, but this may not be possible if fraud or malpractice are to be effectively investigated. The reporter will be informed if anonymity cannot be maintained before release of any identifying information. Any suspicions of fraud must be reported by the person receiving the allegations to the Treasurer and the President, unless there are compelling reasons not to involve either or both in the discussions.

Suspected fraud will be investigated in an independent, open-minded and professional manner with the aim of protecting the interests of FPM, the reporter and the suspected individual or individuals. The focus must be on the message not the messenger, but suspicion should not be seen as guilt to be proven. The precise nature of the investigation will depend on the circumstances, but the steps taken, examinations made, and the outcome of the investigation should be carefully documented. The Treasurer and President, as the most likely sponsors of the investigation, should be kept informed of the progress and outcome and act as liaison between the investigating team, the Chief Executive and the trustees. If the Treasurer or President are not the sponsors, another trustee or trustees will be appointed by those to whom the suspicion was reported.

FPM will take appropriate steps, including legal action if necessary, to recover financial or other losses arising from fraud, theft or misconduct. Where a criminal offence may have been committed, the police will be involved. The outcome of any investigation should be shared with the trustees of FPM, the Chief Executive and the reporter. Following any investigation there should be a review of FPM's Policies and Procedures to prevent similar problems in the future.

In addition to the protection offered to whistle blowers by FPM under this policy, the [Public Interest Disclosures Act 2013](#) offers protection to staff of FPM who make good-faith disclosures within the structure described above about issues that may be a criminal offence, a breach of a legal obligation, a miscarriage of justice, present a danger to the health or safety of any individual, cause damage to the environment, or the deliberate concealment of information concerning these issues. Help and further information may be obtained from the charity Public Concern at Work (PCaW) through their website <https://www.pcaaw.co.uk>.

## 4. Review of policy

The policy statement will be formally reviewed once a year by the Finance Committee and approved by the Board, or more frequently, should the need arise.

| Document        | Version date  | Owned by / Approved by    | Summary of changes and rationale                                                                                                                                                                                                                                    |
|-----------------|---------------|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Original Policy | 28 Nov 2006   | Board / Board             | Not applicable (N/A)                                                                                                                                                                                                                                                |
| Version 2       | 29 April 2010 | Board / Board             | Minor rewording only                                                                                                                                                                                                                                                |
| Version 3       | 16 May 2019   | Finance Committee / Board | <ul style="list-style-type: none"><li>• Public Interest Disclosures Act updated to 2013</li><li>• Public Concern at Work contact details updated</li><li>• Annual review of policy changed from Board to Finance Committee with Board approval of changes</li></ul> |