



WHISTLEBLOWING POLICY

1. What is Whistleblowing?

In this policy 'Whistleblowing' means the reporting by employees of suspected misconduct, illegal acts or failure to act according to approved policies and procedures. It is sometimes known as 'Confidential Reporting'.

The aim of this policy is to encourage employees and others who have serious concerns about any aspect of our work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong. Where an individual discovers information which they believe shows serious malpractice or wrongdoing, this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done – if necessary, independently of line management. 'Whistleblowing' is viewed as a positive act that can make a valuable contribution to ensuring that all WTI staff work in accordance with the values of the organisation and follow approved policies and procedures. It is not disloyal to colleagues or to the organisation to speak up.

If you are considering raising a concern you should read this policy first. It explains:

- the type of issues that can be raised
- how the person raising a concern will be protected from victimisation and harassment
- how to raise a concern, and
- what we will do

2. What is the aim of the policy and when does it apply?

2.1. Aims of the Policy

The policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within Windle Trust International without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

This Policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

2.2. Scope of this Policy

This policy is intended to enable those who become aware of, or reasonably suspect, wrongdoing or malpractice in Windle Trust International to report their concerns at the earliest opportunity so that they can be properly investigated.

The Whistleblowing Policy is not intended to replace existing procedures. If your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures.

2.3. Who can raise a concern under this Policy?

The policy applies to all:

- employees of Windle Trust International, irrespective of where they are based
- employees of external contractors or suppliers
- those providing services under a contract or other agreement with WTI

2.4. What should be reported?

Any serious concerns that you have about service provision or the conduct of staff or Trustees of Windle Trust International or others acting on our behalf that:

- make you feel uncomfortable
- are not in keeping with our values or policies
- fall below accepted standards of practice
- are improper behaviour

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
- Financial malpractice or impropriety or fraud
- racial, sexual, disability or other discrimination
- possible fraud and corruption
- sexual favours or abuse
- improper conduct or unethical behaviour
- attempts to conceal any of these

This list is not exhaustive.

3. Safeguards

3.1 Protection

This policy is designed to offer protection to those who disclose such concerns provided the disclosure is made in good faith.

3.2 Confidentiality

Windle Trust International 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.

3.3. Harassment or Victimisation

Windle Trust International is committed to good practice and high standards in the conduct of any investigation. For our employees, we recognise that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty. WTI will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

3.4. Support to you

Throughout this process:

- you will be given full support from senior management
- your concerns will be taken seriously, and

If you are an employee of WTI, we will consider temporarily re-deploying you for the period of the investigation.

For those who are not employees, we will endeavour to provide appropriate advice and support wherever possible.

3.5. Anonymous Allegations

This policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are, it will be more difficult for us to assess the validity of the allegation or to give you feedback. Although concerns expressed anonymously are less powerful they may be considered at the discretion of the Executive Director in consultation with the Chair of the Board of Trustees. In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

3.6. Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action may be taken.

4. Raising a Concern

4.1. Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns with:

- Your Line Manager
- The Country Director or
- The Executive Director

The UK address for correspondence is:

37a Oxford Road, Cowley, Oxford OX4 2EN

And the email address is info@windle.org.uk

If the concern is about the Executive Director, your concern should be raised with the Chair of the Board of Trustees who can be reached at the address above.

4.2. How to raise a concern

You may raise your concern by telephone, by email, in person or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates)

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person you are contacting that you have a genuine concern relating to suspected wrongdoing or malpractice and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

5. What we will do

Windle Trust International will respond to your concerns as quickly as possible. The overriding principle guiding our response will be the public interest. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the police
- be referred to the external auditor
- be referred and put through established child protection/abuse procedures

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received
- indicating how we propose to deal with the matter
- supplying you with information on staff support mechanisms, if relevant
- telling you whether further investigations will take place and if not, why not

The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and an independent third party may accompany you in support.

Windle Trust International will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, we will arrange for you to receive appropriate advice and support.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

6. How the matter can be taken further

This policy is intended to provide you with an avenue within Windle Trust International to raise concerns. We hope you will be satisfied with any action taken. If you are not, and you feel it is right to take the matter to our regulator, you should contact the Charity Commission at <https://www.gov.uk/complain-about-charity/>

This policy does not prevent you from taking your own legal advice.

7. Review of the Policy

The Board of Trustees will review this Policy annually.

Reviewed and Approved: 21 March 2018