Whistleblowing Policy & Procedure

June 2019
Policy Reference Information

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<tr>
<th>Status</th>
<th>Final</th>
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<tbody>
<tr>
<td>Author/Lead</td>
<td>Nicola Williams</td>
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<td>Date of Last Review Date</td>
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<td>Date of Next Formal Review</td>
<td>June 2021</td>
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Key Related Policies and Information

<table>
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<th>Policy Title</th>
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<td>Misuse of Funds</td>
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<td>Grievance Policy</td>
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1. Introduction

1.1 This policy applies to all employees, volunteers and officers of the organisation. Other individuals performing functions in relation to the organisation, such as agency workers, consultants and any other Christian Aid representatives are encouraged to use it.

1.2 This policy is primarily for concerns or disclosures where the interest of others or of Christian Aid is at risk. Such concerns or disclosures are ones that the individual(s) raising the concern reasonably believes that one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:

- a criminal offence
- the breach of a legal obligation
- a breach of the Code of Conduct
- a miscarriage of justice
- a danger to the health and safety of any individual
- damage to the environment
- deliberate concealment of information tending to show any of the above six matters

1.3 When a concern feels serious because it is about a possible sexual misconduct or abuse, fraud, danger or malpractice that might affect beneficiaries, colleagues or Christian Aid, it can be difficult to know what to do. Staff may individually or collectively be worried about raising such a concern or may decide to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.

1.4 The policy provides an alternative route for raising concerns if they do not feel able to do so through normal line management channels or if the Representative raising the issue feels that it is sufficiently serious to escalate because there has been no progress in addressing the issue through line management.

If you do suspect someone of wrongdoing against an individual or the organisation, you are obliged to report it through your line manager, Head of Region or through this policy. Failure to report may be in breach of your duty of care and your obligations against the organisation’s Code of Conduct.

2. Christian Aid’s Assurances

1.5 The Board, Chief Executive and Directors are committed to this policy. If Christian Aid Representatives raise a concern under this policy, they will not be at risk of losing their jobs or suffering any form of retribution as a result. Christian Aid will not tolerate the harassment or victimisation of anyone raising a concern. Rather than wait for proof, Christian Aid prefers that Representatives raise the matter of concern. Provided they are acting in good faith, it does not matter if they are mistaken.

1.6 Christian Aid actively promotes accountability and good practice in the workplace and wishes to ensure that concerns about suspected serious malpractice, illegal or dangerous practices can be properly raised by Representatives and addressed before the public interest is affected. Christian Aid will make every effort to thoroughly investigate and deal seriously with such concerns, raised in good faith and through the following procedure, in a fair, objective and discreet manner.
1.7 Confidence: With these assurances, we hope Representatives will raise their concerns openly. However, we recognise that there may be circumstances when they would prefer to speak to someone in confidence first. If this is the case, they are required to say so at the outset. If the individual chooses not to disclose their identity, the organisation will not do so without their consent unless required by law.

1.8 Representatives raising a concern should understand that there may be times when Christian Aid is unable to resolve a concern without revealing their identity, for example where personal evidence is essential. In such cases, Christian Aid representatives will discuss whether and how the matter can best proceed with the individual raising the concern.

1.9 If a concern is reported anonymously it is difficult for Christian Aid to provide and ensure assurances. To be fair and consistent to all parties it is important that the individual(s) raising the concern does not seek anonymity. If the individual raising the concern does not tell us who they are it is considerably more difficult to look into the matter. It is also more difficult to protect that individual's position on the issues of concern or to give them feedback.

1.10 If a Representative is unsure about raising a concern, they can get independent advice from Protect (see contact details under Independent Advice).

3. How to Raise Concerns Internally

3.1 If the concern is about misuse of funds, the misuse of funds policy should be used in the first instance. If the concern is about sexual harassment, exploitation or abuse, the Safeguarding Policy should be used in the first instance. If, Representatives raising a concern wish to make a complaint about employment or how others or the individual raising the issue has been treated, the grievance or bullying / harassment policy should be used. This can be obtained from line managers or People Advisors. Additionally, if there is a concern about bribery, corruption, breaches in code of conduct and terrorist activities, please refer to these policies in the first instance.

3.2 The individual raising the concern does not need to have firm evidence of malpractice before raising a concern. However, we ask that the individual explains as fully as they can the information or circumstances that gave rise to their concern. The method of disclosure could be verbal. Ideally it should be in writing (a letter/email/memo) sent to one of the whistleblowing@christian-aid.org, or to the whistleblowing trustee email address, which is vicechair@christian-aid.org for safeguarding concerns, please email safeguarding@christian-aid.org or directly to one of the named persons.

3.3 Step One

Christian Aid Representatives who become aware of any criminal wrongdoing or who have serious concerns about safeguarding, malpractice, theft or fraud which might adversely affect Christian Aid’s business or reputation or might otherwise put at risk the health or safety of anyone, should first raise it in confidence with their line manager or team leader. This may be done verbally or in writing.
3.4 Step Two

If the individual raising the concern feels unable to raise the matter with their manager, for whatever reason, the matter should be raised with one of the following named persons:

**Siobhan O’Reilly**  
Global Head of People  
Email: soreilly@christian-aid.org  
Phone: +44 (0) 7778109837  
Interchurch House  
35-41 Lower Marsh  
London SE1 7RL UK

**Gaynor Miller**  
Head of Internal Audit & Risk Management  
Email: gmiller@christian-aid.org  
Phone: +44 (0) 2075232054  
Interchurch House  
35-41 Lower Marsh  
London SE1 7RL UK

**Josie Oppong**  
Governance Manager  
Email: joppong@christian-aid.org  
Phone: +44 (0) 207523 2053  
Interchurch House  
35-41 Lower Marsh  
London SE1 7RL UK

**Martin Birch**  
Chief Operating Officer  
Email: mbirch@christian-aid.org  
Phone: +44 (0) 207523 2222  
Interchurch House  
35-41 Lower Marsh  
London SE1 7RL UK

If the individual raising the concern believes there are outstanding/unresolved issues or that there has been unreasonable delay in handling or addressing the concern, they can contact Christian Aid’s Chief Executive or the named trustee setting out what they believe the outstanding or unresolved issues are:

**Amanda Mukwashi**  
Chief Executive  
Email: amukwashi@christian-aid.org  
Phone: +44 (0)207 523 2356  
Interchurch House  
35-41 Lower Marsh  
London, SE1 7RL UK

**Trustee**  
Email: vicechair@christian-aid.org  
Phone: please use email address  
Interchurch House  
35-41 Lower Marsh  
London SE1 7RL UK London

4. How Christian Aid will Handle Concerns Raised

4.1 Issues of concerns & disclosure will wherever possible be acknowledged within 5 workingdays.

4.2 Once a concern has been received it will be assessed and considered with regards to appropriate action to be taken. The process for the investigation will depend on the type of complaint being made and the policy under which it is being investigated. For example, if it is a sexual misconduct issue, the policy may be to suspend while investigation takes place.

The named person who has been contacted will make every effort to deal with such disclosure in a fair & objective manner by investigating the matter as quickly as possible or nominating an appropriate person to do so.

4.3 This may involve an informal review, an internal inquiry or a more formal investigation. Christian Aid will tell the individual who has raised the concern details of the person handling the matter, how they can be contacted and what further assistance (if any) is required of the individual raising the concern.
4.4 When a Representative raises a concern, it will be helpful to know how they think the matter might best be resolved. If they have any personal interest in the matter, we do ask that this is disclosed at the outset.

4.5 Whenever possible, the individual will be given feedback on the outcome of any investigation. However, we may not be able to tell the individual about the precise actions we take where this would infringe a duty of confidence we owe to another person.

4.6 On completion of the investigation the named person will make a recommendation on the appropriate course of action to the directorate/Board who will make the final decision. There is no right of appeal against the outcome/decision made under the speaking up policy.

4.7 The outcome of this may trigger the use of other Christian Aid processes that require further action. For example, if the concern falls more properly within our grievance, bullying and harassment or other relevant procedures the individual raising the concern will be informed of this where appropriate.

5. **Independent Advice & External Contacts**

5.1 If you are unsure whether to use this policy or you want confidential advice at any stage, you may contact the independent UK charity Protect on 020 3117 2520 or visit their website on [www.pcaw.org.uk/contact-protect-advice-line/](http://www.pcaw.org.uk/contact-protect-advice-line/). Their lawyers can talk you through your options and help you raise a concern about malpractice at work. You can also contact your union (where applicable) for advice.

5.2 Christian Aid recognises that there may be circumstances where an individual can report a concern to an outside body. In such circumstances Christian Aid would rather that such matters are raised with our regulator – the Charity Commission, than not at all. Alternatively, through Protect on 020 3117 2520 (or, if applicable, your union) will be able to advise you on such an option.

5.3 Contact details for the charity commission is:

Charity Commission of England and Wales  
Tel: 0845 300 0218  
Online contact through [www.charitycommission.gov.uk](http://www.charitycommission.gov.uk)

Additionally, a concern about a matter in Scotland may be reported to:

Office of the Scottish Charity Regulator  
Tel: 01382 220446  
Fax: 01382 220314  
Address: Office of the Scottish Charity Regulator (OSCR)  
2nd Floor, Quadrant House  
9 Riverside Drive  
Dundee, DD1 4NY  
Email: [info@oscr.org.uk](mailto:info@oscr.org.uk)

If you wish to obtain advice from our independent provider, you can contact thirtyone:eight. Telephone 0303 003 11 11 or by email at [info@thirtyoneeight.org](mailto:info@thirtyoneeight.org)