

# Self Help Africa

## Whistleblowing Policy and Procedures

<b>EFFECTIVE DATE</b>	01.05.2017	<b>ISSUE NUMBER</b>	2
<b>POLICY REVIEW</b>	THE BOARD WILL REVIEW THIS POLICY PERIODICALLY TO ENSURE IT REMAINS RELEVANT AND EFFECTIVE.		
<b>RESPONSIBILITY</b>	CHIEF FINANCE AND OPERATIONS OFFICER (CFOO)		
<b>AUTHOR</b>	FINANCE		
<b>SCOPE</b>	THE WHISTLEBLOWING POLICY APPLIES TO ALL SELF HELP AFRICA DIRECTORS AND STAFF AND ALL OTHER AFFILIATE CONTRACTED PERSONNEL WHO MAY CONDUCT WORK ON BEHALF OF SELF HELP AFRICA. THIS POLICY ALSO APPLIES TO THIRD-PARTY REPRESENTATIVES INCLUDE AGENTS, CONSULTANTS, CONTRACTORS AND PARTNER ORGANISATIONS.		

### **1.0 Purpose of Policy**

The organisation is committed to being open, honest and accountable. Being “open” is a key organisational value. We work towards being transparent in all of our operations.

Very occasionally, as in all large organisations, a person or persons working with or for the organisation may appear to be acting improperly, negligently or criminally. The organisation encourages individuals, and organisations with whom it works in partnership, (who act in good faith) to report serious malpractice in accordance with the procedures set out below. We will ensure that those who raise concerns of suspected serious malpractice are protected from dismissal, victimisation or any other detrimental treatment provided that they follow the procedures set out below. People to whom a disclosure of serious malpractice is made should ensure that this policy and procedure is the correct one to follow in the circumstances.

### **2.0 Scope of the Policy**

This policy and procedure covers all employees to deliver on its mission including all salaried employees globally, suppliers, volunteers, children and the target population of the organisation’s work. It applies whether or not the information could be deemed to be confidential and whether the alleged malpractice is occurring in Ireland or overseas. International employees, national employees, volunteers, children, young people, suppliers and all partners working jointly with the organisation are protected by this policy and procedure to ensure consistency and transparency for all those working towards achieving the organisation’s objectives.

### **3.0 Objectives of the Policy**

The purpose of this policy is to provide an effective procedure for people to raise their concerns when they believe that abuse, serious malpractice or professional misconduct has

taken place, is taking place or is likely to take place. The protection outlined above will only be given to those individuals acting in good faith.

“Good faith” is where a disclosure is made with honest intentions and without malicious reasons or spite. It is essential that anyone connected with the organisation that suspects or knows that serious malpractice has taken place, is taking place, or is likely to take place raises their concerns in line with the procedure described in this document.

The term “serious malpractice” includes:

- criminal activity (e.g. child abuse, fraud, bribery, theft, etc.);
- illegality (e.g. negligence, breach of contract, breach of administrative law);
- miscarriage of justice;
- danger to health and safety or the environment;
- victimisation or bullying;
- the cover up of any of the above.

This list is not exhaustive.

**It is important to ascertain at the outset whether this policy is the best one to use in the circumstances, or whether another policy, e.g. the grievance policy or another policy might be more appropriate.**

#### **4.0 Legal Obligations and Best Practice Guidelines**

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The procedure for people with concerns about serious misconduct or malpractice depends upon the nature of their relationship with the organisation; that is, whether they are employees, volunteers, suppliers, partners or people otherwise associated with the organisation.

##### **4.1.1 Employees and Volunteers Responsibility**

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In most cases, employees should raise any concerns with their line manager. This may be done orally or in writing and should include full details and, if possible, supporting evidence. If for some reason, (e.g. the manager may be implicated) this is not possible, they should speak to a more senior manager. For employees based overseas this may be a manager based in-country or in head office.

There may be circumstances when an employee feels that they are unable to do this; for example, when they feel that their line manager is involved, or that they have previously raised this concern and feel that no action has been taken about their concern.

If the employee is in such a situation, they should contact a more senior manager, the CEO, the COO or another member of the senior management. If they believe that the matter cannot be dealt with within the management structure of the organisation, they should contact the named Board Member below. All employees who raise concerns of serious malpractice will be protected from victimisation or any other detrimental treatment if they come forward with serious concerns.

The identity of employees who raise concerns will be kept confidential as far as possible.

#### **4.1.2 Suppliers Responsibility**

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The term 'Suppliers' includes all consultants, contractors, outsourced employees, other individuals, companies and organisations. Suppliers who are concerned that an act of serious malpractice has taken place, is taking place or is likely to take place should in the first instance raise their concerns with the manager who set the terms of reference for their project/ contract. This may be done orally or in writing and should include full details and, if possible, supporting evidence. There may be circumstances when suppliers feel that they are unable to do this, for example when they feel that the manager is involved, or that they have previously raised this concern and feel that no action has been taken. In these circumstances, suppliers should approach a more senior manager, the CEO, the COO or the named Board Member below if they feel that their concerns have not been acted upon.

Any suppliers who raise concerns of serious malpractice will be protected from victimisation or any other detrimental treatment if they come forward, provided that they follow the procedure. The identity of suppliers who raise concerns will be kept confidential as far as possible.

#### **4.1.3 Partners Responsibility**

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The term 'Partners' includes all organisations and agencies who are working with the organisation in support of a programme of work or a jointly managed project. Partners who are concerned that an act of serious malpractice has taken place, is taking place or is likely to take place should in the first instance raise their concerns with the Manager who is responsible for the programme or project in which they are engaged. This may be done orally or in writing and should include full details and, if possible, supporting evidence.

There may be circumstances when partners feel that they are unable to do this, for example when they feel that the manager is involved, or that they have previously raised this concern and feel that no action has been taken. In these circumstances, partners should approach a more senior manager, the CEO or the named Board Member below if they feel that their concerns have not been acted upon.

Any partners who raise concerns of serious malpractice will be protected from victimisation or any other detrimental treatment if they come forward.

The identity of partners who raise concerns will be kept confidential as far as possible.

#### **4.2 Management Responsibility**

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Managers have a responsibility to treat concerns raised, seriously and will investigate them thoroughly in accordance with the organisation's values and policies.

Managers must make themselves aware of other appropriate organisational and local policies and procedures, such as the Child Protection Policy, Fraud Policy and in each case decide whether one of these is a more appropriate mechanism to invoke. Where an allegation of serious malpractice has been made the CEO must be informed. They will

appoint an individual not implicated in the complaint (either an independent manager or an appropriate external professional) to carry out an urgent and confidential investigation and to report back to them.

The CEO will endeavour to ensure that feedback is given to those who raise concerns on what action/s have been taken to address them. However, there may be circumstances where, given the confidential nature of the allegations or the material covered, it will not always be possible to give feedback on actions taken.

Where feedback is possible this will be given as soon as possible. Some situations may be resolved promptly; others may take longer because they require formal investigation or hearings.

## **5.0 Protection**

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International employees, national employees, volunteers, children, young people, suppliers and all partners working jointly with the organisation are protected by this policy to ensure consistency and transparency for all those working towards the objectives of the organisation.

Any concerns raised will be investigated carefully and thoroughly. The organisation will ensure that fair treatment will be followed at all times. Any person accused of alleged misconduct will have the right to put their account of events forward at the earliest opportunity.

All those who raise concerns will be treated fairly and have the right to be represented at any time by a legal practitioner or a colleague not acting in an official capacity. If someone tries to prevent an individual from making a confidential report or victimises that person for raising their concerns, the organisation will treat this as a serious disciplinary offence which will be investigated in accordance with the organisation's disciplinary policy and procedure.

Where allegations by an employee are not made in "good faith" and are found to be false or malicious, this will be treated as a serious disciplinary offence and will be investigated in accordance with the organisation's disciplinary policy and procedure.

## **6.0 Confidentiality**

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The identity of the person/s who raises concerns will be kept confidential as far as possible. However, due to the nature of some investigation processes it may not be possible to retain complete confidentiality. This includes situations where the police are involved, where statutory child protection procedures need to be adhered to, or when disciplinary investigations are held and individuals need to make a statement, which may be seen by third parties.

## **7.0 Anonymous Reporting**

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Anonymous reporting can come in two forms:

- The first is where an individual sends a letter or an e-mail, or makes a phone call to management and makes an allegation or statement without leaving their name.

- The second form is where an individual makes an allegation or statement to management, but wants their identity kept secret from those that they have accused of malpractice/misconduct.

The former is very difficult to act upon as there may be no or little corroborated evidence to substantiate the allegations. However, this does not mean that there is no malpractice or misconduct taking place. Management will have to make a choice of either ignoring the anonymous information or “informally” investigating the information, initiating formal proceedings if corroborating evidence is found.

The organisation understands that some people may wish to report their concerns anonymously and accepts that this may occur from time to time. However, the organisation feels that it is more appropriate for individuals to come forward with their concerns rather than raising them anonymously. Anonymous reporting can make it difficult to clarify the issues, substantiate claims and investigate concerns properly.

Self Help Africa employs an independent external whistleblowing service to which serious concerns (which cannot be relayed through line management channels) can be directed via e-mail, website, fax, phone or post. This service operates on a 24/7/365 basis. Concerns will be dealt with confidentially, and the matter will be channelled back to the organisation at a level that will preserve this confidentiality and/or anonymity and that is appropriate to the gravity of the issue. Contact details for the service are set out in section 9.0 below.

## **8.0 Feedback**

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Feedback and the progress of any concerns raised will be given as soon as possible. Some situations may be resolved promptly, whilst others may take longer because they require formal investigation or hearings.

## **9.0 Whistleblower Nominated Contact Persons**

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If there are concerns that employees feel cannot be raised through line management and they wish to contact the Executive Director (ED), Chief Finance and Operations Officer (CFOO) or the nominated board member (the Treasurer), then they should use the contact details below. The contact details for the external whistleblowing service are set out below also. Postal correspondence should be marked **“Strictly Private and Confidential – to be opened by addressee only”**.

### **Internal Organisational Contacts:**

Title	Contact details
Executive Director:	E-mail - <a href="mailto:ed@selfhelpafrica.org">ed@selfhelpafrica.org</a> Phone - +353 87 9173101 Post - c/o Self Help Africa, Kingsbridge House, 17-22 Parkgate St, Dublin 8, Ireland.
Chief Finance and Operations Officer (CFOO):	E-mail - <a href="mailto:cfo@selfhelpafrica.org">cfo@selfhelpafrica.org</a> Phone - +353 87 2404343 Post - c/o Self Help Africa, Kingsbridge House, 17-22 Parkgate St, Dublin 8, Ireland.
Nominated board member (Treasurer):	E-mail - <a href="mailto:confidential.reporting@selfhelpafrica.org">confidential.reporting@selfhelpafrica.org</a> Phone - +353 85 8778318 Post - c/o Self Help Africa, Kingsbridge House, 17-22 Parkgate St, Dublin 8, Ireland.

#### External Whistle-blower service contacts

External Whistle-blower Service	Contact details
ExpoLink	E-mail - <a href="mailto:selfhelpafrica@expolink.co.uk">selfhelpafrica@expolink.co.uk</a> Phone UK - <b>0800 374 199</b> Phone International: <b>+44 1249 661808</b> (reverse charges available via international operator) Web - <a href="https://wrs.expolink.co.uk/selfhelpafrica">https://wrs.expolink.co.uk/selfhelpafrica</a> Post: <b>Expolink, 1 Greenways Business Park Bellinger Close Chippenham, Wiltshire SN15 1BN United Kingdom</b>

#### **10.0 Abuse of this policy**

Any abuse in the application of this policy will be dealt with in accordance with the Organisation's Disciplinary Policy and Procedure and may possibly result in disciplinary action being taken up to and including dismissal.

**11.0 Alterations and amendments to this Policy**

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The Organisation reserves the right to amend or withdraw this policy at its absolute discretion, in accordance with the needs of the business. Any such changes will be notified to employees by the appropriate means.

**12.0 Acknowledgement of receipt and understanding of this Policy**

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*I acknowledge receipt of a copy of this document and accept the above policy and procedure terms and conditions. I also acknowledge my responsibility to keep abreast of this policy and procedure.*

<b>Employee Name (print name)</b>	
<b>Employee Signature</b>	
<b>Date</b>	