



Whistleblowing Policy

Approved December 2023

HOPE worldwide WHISTLEBLOWING POLICY

1. Introduction

HOPE worldwide UK (HWW UK) is committed to the highest standards of honesty, integrity, and accountability. Nevertheless, where any person believes they have discovered information which shows serious malpractice or wrongdoing within the organisation, then this information should be reported in a confidential manner so that HWW UK can address and correct inappropriate conduct and actions.

2. Scope

This policy covers any person working with or for HWW UK, including trustees, employees, officers, consultants, contractors, volunteers, interns, casual workers, and agency workers. In addition, this policy is available as a reporting mechanism to all beneficiaries, visitors, donors, and sponsors of HWW UK. It encourages disclosures to be made in the public interest without restriction or repercussion.

This policy does not form part of any employee's contract of employment. The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. HWW UK has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

This policy is not designed to question financial or business decisions taken by HWW UK, nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures.

3. Concerns

Concerns of serious malpractice or wrongdoing that are in the public interest could include, but are not limited to:

- Failure to comply with a legal obligation or Statute
- Financial malpractice, impropriety or fraud
- Corruption or bribery
- Dangers to Health & Safety or the environment
- Discrimination
- Criminal activity
- Improper conduct or unethical behaviour
- Breach or violation relating to other HWW UK policies, including Safeguarding Policy, Data Protection Policy, Code of Conduct, and Equality, Diversity and Inclusion Policy
- Attempts to conceal any of the above.

4. Supporting Policies

This policy is supported by:

- HWW UK Safeguarding Policy
- HWW UK Data Protection Policy
- HWW UK Code of Conduct
- HWW UK Disciplinary Procedure
- HWW UK Equality, Diversity and Inclusion Policy
- HWW UK Health and Safety Policy

5. Protection

This policy is designed to offer protection to those who disclose such concerns provided the disclosure is made in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person.

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to follow the procedure described in Point 9 of this policy - 'Procedure for Making a Disclosure'. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

6. Confidentiality

HWW UK will treat all 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.

7. Anonymous Allegations

This policy encourages individuals to put their name and contact details to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of HWW UK.

8. Untrue Allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

9. Procedure for Making a Disclosure

HWW UK has a confidential e-mail address that individuals may use to make a disclosure. This e-mail address is accessed by Martin Saurma-Jeltsch and Muriel Gutu. The address is trustees@hopeworldwide.org.uk

A disclosure should contain as much information as possible, including:

- Name and contact details of the person making the disclosure;
- Nature of the allegation;
- Name/s of the person/s involved in the allegation;
- Dates, times, and locations of the allegation;
- Relevant documentation (if available);
- Names of any witnesses; and
- Any other supporting evidence.

On receipt of a disclosure of malpractice, the Trustee who receives and takes note of the disclosure must pass this information, as soon as is reasonably possible, to the Chief Executive who may conduct an investigation personally or nominate an appropriate investigating officer.

Where a disclosure of malpractice is made against the Chief Executive, the Trustee who receives and takes note of the disclosure must pass this information, as soon as is reasonably possible, to the Chair of the Board of Trustees who may conduct an investigation personally or nominate an appropriate investigating officer.

If there is evidence of criminal activity, then the investigating officer should inform the police. HWW UK will ensure that any internal investigation does not hinder a formal police investigation.

10. Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should consider the involvement of HWW UK's auditors and the Police at this stage.
- The allegations should be fully investigated by the investigating officer with the assistance, where appropriate, of other individuals/bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement.
- The Chief Executive (or Chair of the Board of Trustees) will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Charity procedures.
- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcome will be passed to HWW UK Auditors to enable a review of the procedures.

11. Timescales

Due to the varied nature of these sorts of complaints, which may involve internal investigators and/or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer should, as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.