



WHISTLEBLOWING POLICY

Version control

Version number	2.2
Version date	June 2026
Publication on IIED website	Yes
Owner	Chief Operating Officer
For review	People Culture & Remuneration Committee
For approval	Board of Trustees
Next review date	June 2029

Contents

Policy statement	2
Scope.....	2
1. What is whistleblowing?	2
2. Raising a whistleblowing concern.....	3
3. Confidentiality.....	3
4. External disclosures	4
5. Investigation and outcome.....	4
6. If you are not satisfied.....	4
7. Protection and support for whistleblowers.....	4
8. Responsibility for the success of this policy	5
9. Contacts	5
Version history	5

Note: This policy was developed and approved by the International Institute for Environment and Development (IIED) for internal use. It is believed to be an accurate reflection of the legislation and other regulatory requirements at the time it was approved. It should not be incorporated into or used by other organisations without permission.

Policy statement

We are committed to conducting our business with honesty and integrity, and we expect all employees and related personnel - as defined in the scope below - to maintain high standards. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

The aims of this policy are:

- To encourage employees and related personnel to report suspected wrongdoings as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- To provide guidance as to how to raise those concerns, whether this is in a verbal or written format with a designated individual, via our [Report & Support Tool](#) or via email: whistleblowing@iied.org. The whistleblowing mailbox is monitored by the COO (Whistleblowing Officer) and the Director of People.
- To reassure employees and related personnel that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy takes account of the UK government Whistleblowing Guidance and Code of Practice. As IIED has its registered office in the UK, all IIED policies are UK law compliant. If a jurisdiction outside of the UK provides for a higher threshold of legislative requirements, then those legal requirements will govern locally. This policy does not form part of any employee's contract of employment.

Scope

This policy applies to employees and related personnel. Related personnel include Trustees, associates, consultants, volunteers/interns, workers, contractors and grantees to IIED. This includes organisations and individuals who have entered into partnership, grantee, or recipient agreements with IIED as well as their own related personnel who are involved in the delivery of work with or for IIED. It is a condition of employment that all employees respect and act in accordance with this policy. Failure to do so will result in disciplinary procedures being initiated which could lead to dismissal.

1. What is whistleblowing?

1.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity
- miscarriages of justice
- danger to health and safety
- damage to the environment
- failure to comply with any legal or professional obligation or regulatory requirements
- bribery
- financial fraud or mismanagement
- negligence
- breach of our internal policies and procedures
- safeguarding incident including sexual harassment
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters

- 1.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.
- 1.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases, you should use IIED's Grievance Procedure.
- 1.4 If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officer, whose contact details are at the end of this policy.

2. Raising a whistleblowing concern

- 2.1 In the first instance, for internal stakeholders, processes within existing policies for specific areas should be followed – for example concerns relating to safeguarding or fraud.
- 2.2 Where appropriate, we hope that in many cases, you will be able to raise any concerns with your appointed manager. You may tell them in person or put the matter in writing. You do not need to provide the evidence for your concern – a reasonable belief of suspected wrongdoing or danger at work is all that is required. The concern could be past, present or even prospective. Managers may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer (Chief Operating Officer). You can also report your concerns via the [Report & Support Tool](#) or email whistleblowing@iied.org.
- 2.3 However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact any of the following:
 - The Whistleblowing Officer (Chief Operating Officer)
 - Director of People
 - Executive Director

Where a concern relates to the Chief Operating Officer, Director of Finance and Operations, Director of People or the Executive Director, reports may also be made to IIED's Board of Trustees: whistleblowingtrustee@iied.org.

Contact details are set out at the end of this policy.

- 2.4 The designated person at IIED will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or, if you are a Union Member, you may bring a representative with you to any meetings under this policy. Your colleague must respect the confidentiality of your disclosure and any subsequent investigation.
- 2.5 We will note a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

3. Confidentiality

- 3.1 If you wish to raise your concern anonymously, we will make every effort to conceal your identity. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- 3.2 We do not encourage individuals to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. Whistleblowers who are concerned about possible reprisals (if their identity is revealed) should come forward to the Whistleblowing Officer, or one of the other contact points listed in section 9, and appropriate measures will be taken to preserve confidentiality. If you are in any doubt, you can seek advice from [Protect](#) (formerly Public Concern at Work), the independent whistleblowing charity, who offer a confidential helpline. Their contact details are at the end of this policy.

4. External disclosures

- 4.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace.
- 4.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely - if ever - be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external, for example advice from Protect.
- 4.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party. In some circumstances, the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your appointed manager or one of the other individuals set out in section 9 for guidance.

5. Investigation and outcome

- 5.1 Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- 5.2 In some cases, we may appoint an investigator or team of investigators including staff with relevant experience. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- 5.3 We aim to acknowledge your concern within 1 working day and inform you of the progress of the investigation and a likely timescale within 5 working days. However, sometimes the need for confidentiality may prevent us sharing specific details of the investigation or any disciplinary action taken as a result. You must treat any information about the investigation as confidential.
- 5.4 If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

6. If you are not satisfied

- 6.1 We will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.
- 6.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in section 9. Alternatively, you may contact our external auditors or Protect. Contact details are given at the end of this policy.

7. Protection and support for whistleblowers

- 7.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will treat all cases with confidentiality and support individuals who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 7.2 Individuals making qualifying disclosures are protected against detrimental treatment by The Public Interest Disclosure Act 1998. Detrimental treatment includes dismissal, disciplinary action, bullying, harassment, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the People Team immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.

- 7.3 Individuals must not threaten or retaliate against whistleblowers in any way. This can count as victimisation of the whistleblower. If you are involved in such conduct you may be subject to disciplinary action.

8. Responsibility for the success of this policy

- 8.1 The Whistleblowing Officer has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who are required to deal with concerns or investigations under this policy have the appropriate skills and knowledge to do so.
- 8.2 The Whistleblowing Officer, in conjunction with the People Team, should review this policy from a legal and operational perspective every 3 years, or sooner subject to experience following whistleblowing incidents or legislation change.
- 8.3 All employees are responsible for the success of this policy for disclosing any suspected danger or wrongdoing. Comments, suggestions or queries on this policy should be addressed to the Whistleblowing Officer.

9. Contacts

Whistleblowing Officer – Chief Operating Officer	whistleblowing@iied.org
Director of People	whistleblowing@iied.org
Executive Director	Tom Mitchell tom.mitchell@iied.org
IIED's Board of Trustees	whistleblowingtrustee@iied.org
External Auditors	Crowe LLP, 55 Ludgate Hill, London, EC4M 7JW
Protect (formerly Public Concern at Work) (Independent whistleblowing charity) Protect is a registered Charity No.1025557. Registered as a Company limited by guarantee in England No. 2849833. Registered office at The Green House, 244-254 Cambridge Heath Road, London E2 9DA	<u>Free confidential whistleblowing advice</u> +44 (0)2031 172 520 <u>Website</u> https://protect-advice.org.uk/contact-protect-advice-line/ <u>Hours</u> Mon, Tue, Thurs: 09:30-13:00, 14:00-17:30 Wed, Fri : 09:30-13:00

Version history

Version No.	Date (MM/YYYY)	Updated by	Reason
1	12/2022	COO	Scheduled update
2	03/2025	COO	Scheduled update
2.1	03/2026	COO	Addition of mechanism for direct reporting to trustees
2.2	06/2026	COO	Addition of sexual harassment as potential, protected disclosure