

WHISTLEBLOWING POLICY

Contact: **Chief Operating Officer**

Issued/updated: **December 2022**

Policy Statement

We are committed to conducting our business with honesty and integrity, and we expect all staff 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 staff 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 staff with guidance as to how to raise those concerns
- To reassure staff 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 Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work. This policy does not form part of any employee's contract of employment and it may be amended at any time.

Scope

This policy applies to all individuals working at all levels of the organisation, including employees, consultants, contractors, casual staff, agency staff, volunteers and interns.

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
- conduct likely to damage our reputation
- unauthorised disclosure of confidential information
- the deliberate concealment of any of the above matters

- 1.2 A **whistle-blower** 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 We hope that in many cases, you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. You do not need to provide the evidence for your concern – a reasonable belief of suspected wrongdoing or dangers at work is all that is required. Furthermore, the concern could be past, present or even prospective. The line manager 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.
- 2.2 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)
 - Senior HR Manager & HR Manager
 - The Director
- Contact details are set out at the end of this policy.
- 2.3 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your colleague must respect the confidentiality of your disclosure and any subsequent investigation.
- 2.4 We will take down 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 want to raise your concern confidentially, we will make every effort to keep your identity secret. 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 staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. Whistle-blowers 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 paragraph 9 and appropriate measures will be taken to preserve confidentiality. If you are in any doubt, you can seek advice from 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 Public Concern at Work.
- 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 line manager or one of the other individuals set out in paragraph 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 will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

- 5.4 If we conclude that a whistle-blower has made false allegations maliciously or with a view to personal gain, the whistle-blower 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 paragraph 9. Alternatively, you may contact our external auditors. Contact details are given at the end of this policy.

7. Protection and support for whistle-blowers

- 7.1 It is understandable that whistle-blowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.
- 7.2 Staff must not suffer any detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform HR immediately. If the matter is not remedied, you should raise it formally using our Grievance Procedure.
- 7.3 Staff must not threaten or retaliate against whistle-blowers in any way. 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 may deal with concerns or investigations under this policy receive regular and appropriate training. The Whistleblowing Officer will do this in conjunction with the Senior HR Manager/ HR Manager.
- 8.2 The Whistleblowing Officer, in conjunction with HR, should review this policy from a legal and operational perspective at least once a year.
- 8.3 All staff are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Staff are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to HR.

9. Contacts

Whistleblowing Officer – Chief Operating Officer	Victoria Reynolds Victoria.reynolds@iied.org
People Team	peopleteam@iied.org
Executive Director	Tom Mitchell Tom.mitchell@iied.org
External Auditors	CROWE CLARK WHITEHILL LLP ST BRIDES HOUSE 10 SALISBURY SQ LONDON EC4Y 8EH
Protect (formerly Public Concern at Work) (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: https://protect-advice.org.uk/contact-protect-advice-line/ Hours We are open Monday to Friday 9am-5.30pm. Registered charity number 1025557 Company Registered in England 2849833 VAT no 626 7725 17

10. Version control

Revision	Date	Who	Reason
1.0	2017-01	Deborah Harris	Initial release
2.0	2018-09	DH	2018 update
2.1	2022-12-02	James Persad	Update contacts
2.2	2022-12-05	Chris Brody	Rename, add version control block