

WHISTLEBLOWING POLICY

Approved by the Board 5 September 2018

INTRODUCTION

The purpose of this Whistleblowing Policy is to ensure individuals acting on behalf of Scotland's International Development Alliance (the Alliance) who disclose a genuine and serious concern under this policy are protected from victimisation, harassment, grievance or disciplinary procedures as a result of the disclosure. The policy is committed to and guided by the principles of fairness, openness and transparency, protection, and accountability

Through this policy, all employees, trustees, mentors, temporary employee, consultants, interns and volunteers and others acting on behalf of the Alliance should:

- Understand their responsibility to raise concerns through the Whistleblowing Policy where appropriate
- Have clarity around the procedures to be followed if there is a concern which they believe should be raised formally

HOW DO WE DEFINE WHISTLEBLOWING?

Whistleblowing is where an employee, trustee, mentor, temporary employee, consultant, intern, volunteer or other acting on behalf of the Alliance reports a concern about a wrongdoing of their colleagues or their employer which may cause harm to others or to the organisation. Examples include but are not restricted to theft, fraud, abuse, misuse of resources, risk or malpractice. The disclosure should be made in good faith and believed to be true., even if the information turns out to be incorrect on investigation. Whistleblowing is distinct from making a complaint or raising a grievance which is where an individual states that they have personally been poorly treated.

A whistle-blower is usually not directly or personally affected by the concern and therefore would not usually have a direct personal interest in the outcome of any investigation into their concerns. The whistle-blower raises the concern so that others can address it.

REPORTING PROCEDURES

When an employee, trustee, mentor, temporary employee, consultant, intern or volunteer believes there is a genuine concern under this policy, this should be raised in the first instance with the CEO. If the concern relates to the CEO, then this should be raised with the Chair of the Board or the designated Safeguarding Focal Board member. The Chair of the Board and the designated Safeguarding Focal Board must not be the same gender so that the individual reporting the concern does not feel uncomfortable about raising a concern due to gender difference.

The CEO would instigate an investigation of the disclosure, in conjunction with the Chair of the Board and at least one other Board member. The disclosure should be reported to the Office of the Scottish Charity Regulator (OSCR) as a notifiable event. Depending on the nature of the disclosure, a report should be made to the Police if required.

The investigation and reporting would be based on the following principles:

- All disclosures must be dealt with consistently, fairly and promptly
- All reasonable steps must be taken to maintain the confidentiality of the whistle-blower where it is requested (unless required by law to break that confidentiality).
- Feedback should be provided to the whistle-blower where appropriate, and if not breaching confidentiality or legal consideration.
- Anonymous whistle-blowers will not ordinarily be able to receive feedback and any action taken to look into a disclosure could be limited – anonymous whistle-blowers may seek feedback through a telephone appointment or by using an anonymised email address.
- Victimisation of a whistle-blower is not tolerable the Alliance will take appropriate action to protect the individual from any harassment, victimisation or bullying and any instances of victimisation will be taken seriously and managed appropriately.
- The whistle-blower does not need to provide evidence for the employer to look into the concerns raised.