

Voicing Concerns / Whistleblowing Policy

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Annex 1

1. Purpose

The purpose of this policy is to ensure that ADD International's staff, partners, and members of the public can raise concerns about any wrongdoing or malpractice within ADD International without fear of victimisation, subsequent discrimination, disadvantage or dismissal. The policy also intended to encourage and enable staff members to raise serious concerns within ADD International rather than ignoring a problem or blowing the whistle outside of the organisation.

The policy will be reviewed regularly (every 2 years) and approved by the Board of Trustees. Any concerns relating to this policy, its implementation or breaches should be brought to the attention of the key ADD International Staff and/or Trustees, as detailed in Annex 1 below.

2. Scope

The policy is intended to enable reporting from those who become aware of a wrongdoing, but for clarity the policy applies to all:

- Staff (based in the UK and overseas)
- Trustees and other Board Committee members
- Partner Organisations
- Contractors and consultants (including visiting journalists, media consultants etc)
- Volunteers and interns
- Participants and Trainees
- Visitors to ADD premises, programmes or sponsored activities
- The General Public

In this policy "staff" or "staff member" is taken to refer to all these categories or anyone contracted directly to ADD International.

Partners and partner staff are expected to be in line with this policy as part of their agreement with ADD; if they do not have their own Voicing Concerns / Whistleblowing Policy, they could adopt / adapt this code in the first instance.

ADD International encourages open and honest communication at all levels. However, it recognises that from time to time employees may wish to raise concerns, problems or complaints with their employer. For these types of concerns, they should be dealt with under the Grievance Procedure.

ADD International will ensure all staff and anyone contracted to ADD International either as individuals or organisationally, are made aware of the policy and procedures – and make the policy available to the public on its website, and through other means as appropriate.

ADD International's managers have a responsibility to both uphold the principles and values of ADD as well as ensuring all staff and stakeholders are aware of the policy and procedures and are encouraged to raise concerns in a supportive environment.

3. Definition of Whistleblowing

Whistleblowing is used to describe incidents where an employee or other stakeholder publicly discloses some alleged wrongdoing within an organisation. Put at its simplest, whistleblowing occurs when an employee or worker provides certain types of information, usually to the employer or a regulator, which has come to their attention through work. The disclosure may be about the alleged wrongful conduct of the employer, or about the conduct of a fellow employee, client or any third party. The whistleblower is usually not directly, or personally affected by the danger or illegality, although they may be. Whistleblowing is therefore 'making a disclosure in the public interest', and occurs when someone raises a concern about a danger or illegality that may affect others, for example members of the public.

In this policy 'Whistleblowing' means the reporting by staff of suspected misconduct, illegal acts or failure to act within ADD International.

ADD International will not tolerate serious wrongdoing and is concerned to identify and remedy such malpractice.

ADD International aims to promote openness in the workplace and will take appropriate action to protect whistleblowers who are acting in the organisation's interest from detrimental treatment, ie. victimisation or dismissal. However, staff should not disclose to external sources any confidential information acquired during the course of their employment unless they feel such disclosure is in the overall interest of the organisation.

Raising concerns about wrongdoing can be one of the most difficult and challenging things to do in a work environment. 'Whistleblowing' is viewed by ADD as a positive act that can make a valuable contribution to ADD's efficiency and long-term success. It is not disloyal to colleagues or to speak up. ADD is committed to achieving the highest possible standards in its work and the highest possible ethical standards in all of its

offices and activities. To help achieve these standards ADD encourages freedom of speech, and therefore, this policy reflects the legal protection given to staff under the UK Public Interest Act 1998.

4. Type of Concerns

The type of concerns that can be raised under this policy include, but is not limited to, information relating to:

- A criminal offence, theft, or other illegal activity
- A miscarriage of justice
- Failure to comply with a legal obligation or regulatory requirement
- Practices endangering health and safety
- Practices damaging the environment
- Fraud, corruption, bribery or blackmail
- Administrative malpractices (such as improprieties in matters of finance and non-financial reporting)
- Improper conduct or unethical behavior
- Bullying, harassment and abuse
- Unauthorised disclosure of confidential information
- Breach of ADD's Code of Conduct or policies
- Suppression or concealment of any of the above

The concern can be about an incident that happened in the past, is happening now or that you believe is likely to happen in the future. All disclosures should be made with the 'reasonable belief' that it is in the public interest. Whistleblowing does not cover concerns where there is no public interest element such as complaints about your own employment and or related matters. All personal grievances can and should first

be addressed through ADD's grievance procedures. However, these matters can be reported through whistleblowing channels too if there has been a failure by ADD to address these issues through ADD's grievance procedures in a reasonable timeframe.

If a member of staff fails to notify ADD International when certain of an occurrence included in, but not limited to, the list of categories of concerns stated in the above list, it may be regarded as a misconduct by ADD, unless it is deemed that there was justifiable reasons not to notify the organisation.

5. Raising a Concern

There is no one method that staff or others should use to make a disclosure; they can use in-person conversation, e-mail, telephone or post. The disclosure method depends on the seriousness and sensitivity of the issue involved and who is suspected of the wrongdoing.

Staff are often the first to realise that there may be something seriously wrong within ADD International. If a staff member sees or finds out about something they think is wrong at ADD, then they should report it as soon as possible.

This policy explains the steps to raise concerns internally and externally.

5.1. Raising a Concern Internally

Step 1

Where possible, staff should raise any concerns with their line manager. This may be done either verbally or in writing. If they cannot or do not wish to do this for any reason then they can raise it with their contacts within ADD International or follow the steps below.

Step 2

If a staff member feels unable, for whatever reason, to raise the matter with their line manager, then they may go to the country level safeguarding focal point, an SMT member, or the Country Director, as appropriate.

Step 3

If the steps above have been followed but the concerns have not been addressed, or if the staff member feels that the concerns cannot be discussed with any of the above, then contact can be made directly with Chief Executive, the designated Trustee Focal Point for Safeguarding, or Chair of the Board.

ADD also maintains a page on their website to report complaints, and operates an e-mail address for the reporting of concerns: safeguarding@add.org.uk. All complaints reported via this channel will be received by Chief Executive.

5.2. Raising a Concern Externally

Where attempts to raise matters internally have been unsuccessful or, exceptionally, these concerns cannot be raised internally, then ADD recommends that staff members should raise these concerns externally. These concerns can be raised with the relevant regulatory authority. In the UK, these can be raised with Charity Commission on 0300 066 9197 or at whistleblowing@charitycommission.gsi.gov.uk.

5.3. Timeframe for Raising a Concern

Concerns should be raised as soon as possible after the staff member or others are made aware of the concern or incident. However, concerns can be raised even many years later, though the ability to respond to the concern or incident may be affected.

5.4. Concerns about the Chief Executive or a Trustee

If exceptionally, the concern is about the Chief Executive or a Trustee, then this should be raised to the designated Trustee Focal Point for Safeguarding or the Chair of the Board, who will decide on how the investigation will proceed.

6. On Receipt of a Concern

Within 72 hours of receiving a complaint or concern, ADD will convene a case conference, comprising key relevant staff members with responsibility for safeguarding (see Annex 1 below). An e-mail will be sent to the complainant acknowledging receipt of the complaint as soon as possible.

ADD must refer suspected cases of child or vulnerable adult sexual abuse to local statutory authorities where possible. The decision about

whether to refer to local police or statutory authorities in other cases is made by the person who it is alleged has been the subject of abuse (“the victim/survivor” - who may or may not be the complainant).

ADD’s safeguarding team will support the victim / survivor and / or complainant regardless of whether they wish to report to local police / statutory authorities or not (see ‘support for survivors and victims’ in the Prevention from Sexual Exploitation and Abuse (PSEA) Policy. ADD’s approach will always be to comply with reporting obligations under local law, as long as the victim has provided their consent to do so. If someone’s life is in danger or the matter relates in any way to a child or adult at risk, then some decisions may have to be taken by ADD (for example, to contact the Police). This recognises that the principle of being survivor led must be balanced against risk and protection of vulnerable groups in every instance. If the victim/survivor is a child or adult at risk, then decisions about their welfare may have to be made by others. However, as far as is possible and appropriate they will be engaged in the conversation about their own welfare.

Confidentiality must be maintained throughout the complaints process by all staff and witnesses. Staff members who breach confidentiality will be subject to disciplinary action up to and including termination of employment. In some cases, such breaches constitute breaking the law.

Retaliation Against Complainants, Victims and Witnesses. ADD will take action against any staff, volunteers or other representatives, whether they are the subject of a complaint or not, who seek or carry out retaliatory action against complainants, victims or other witnesses. Staff who are found to do this will be subject to disciplinary action, up to and including termination of employment.

Outcomes of Misconduct. Employees who are found to contravene ADD’s clearly stated expectations of their sexual conduct will be subject to disciplinary action that may result in dismissal. Volunteers, contractors and other representatives will have their relationship with ADD terminated.

False Allegations. It is extremely rare that staff or other stakeholders are found to have raised allegations which they knew to be false. If a member of staff from ADD is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment.

Complaints about ADD’s Partners. If ADD receives a complaint about a partner organisation, ADD will expect the partner to respond quickly and appropriately. ADD should assist the partner to ascertain its obligations under local law to refer the matter to the police or other statutory authorities for criminal investigation.

Where appropriate, ADD should work with the partner to address the issue through an appropriate independent investigation. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned.

If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner then they risk withdrawal of funding or ending the relationship (including networks and consortia).

Receiving External Complaints and Concerns. Complaints raised and received from outside the organisation must be referred to ADD's designated safeguarding focal points (see Annex 1 below) and must adhere to ADD's policy and procedures as outlined in this document.

7. Investigation and Outcome

ADD takes all disclosures very seriously and an investigation will take place. This may involve meeting with the member of staff to discuss their concern, or collecting any proof of malpractice or illegal practice. Once a protected disclosure has been received, it will be referred to the Chief Executive, who will decide whether sufficient information exists to allow the allegation(s) to be investigated and, if so, the appropriate process to determine:

- The nature and scope of the investigation
- Who will lead the investigation (internal or external)
- The nature of any technical, financial or legal advice that may be required
- A timeframe for the investigation
- Whether any individual(s) under investigation should be suspended

Upon conclusion of the investigation, ADD's safeguarding team will let the whistle-blower know the outcome. The possible outcomes of the investigation may include:

- No further action required
- Disciplinary action as per ADD's global HR policies
- Further investigation

- It may also be appropriate during the investigation to report concerns to other External Agencies, eg. Counter Fraud Service, Police, Social Services, or relevant as per country context. It may be necessary to suspend internal investigations until the outcome of criminal procedures and / or other procedures are known.

ADD will always try to deal with concerns fairly and in an appropriate manner. We cannot always guarantee the outcome any whistleblower is seeking. If the whistleblower is not satisfied with the way in which their concern has been handled because:

- a) They believe the procedures have not been followed properly
- b) There is evidence of prejudice or bias; or
- c) There is further evidence which was not available at the time the original concerns were raised

Then they should raise this with the Chief Executive, or if the allegations relate to the Chief Executive or a Trustee, to the Trustee Safeguarding Focal Point or the Chair of the Board. The Chief Executive, Trustee Safeguarding Focal Point or Chair of the Board will decide if the case meets the grounds for appeal (set out above). If it does, they will appoint an independent member of the Board to hear the appeal. The ADD safeguarding team will let the whistleblower know the outcome of the appeal.

It is possible that a whistleblower may continue to be concerned about an issue. If this is the case there are a number of options open to them to pursue. They may appeal to the Chair of the Board or to the Charity Commission for England and Wales.

8. Protection for Whistleblowers

This policy offers guidance and protection to staff members and public who disclose a whistleblowing concern. At ADD we recognise our duty to ensure the wellbeing of any staff member or public who make a protected disclosure.

8.1. Confidentiality and Anonymity

Any disclosure made under this policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If for any reason, confidentiality is not reasonably practicable, this will be explained to you. ADD International will not disclose an individual's identity without prior consent. However, we hope that staff members and public will feel able to raise concerns openly under this policy.

It is always helpful for ADD to know the identity of the whistleblower in order to conduct a fair and effective investigation of the complaint. However, if an individual wants to raise a concern anonymously, ADD International will make every effort to keep their identity confidential.

ADD accept all anonymously raised claims but sometimes, it may mean that it is difficult to investigate fully if you haven't provided us with enough information. ADD encourage you to raise concerns openly and provide us with your name and contact details. ADD assure you that we will not tolerate any harassment or victimisation.

8.2. Untrue or false allegations

ADD International will take all allegations seriously. ADD is aware that whistleblowers are sometimes worried about possible repercussions. ADD makes it clear that if a member of staff makes an allegation in good faith and holds a reasonable belief that the information is true then they will be covered by the protection set out in this policy regardless of whether they are mistaken, or the matter cannot be proved. However, if ADD International concludes that an individual has made malicious allegations, in bad faith or with a view to personal gain, that individual will be subject to disciplinary action as per the ADD's disciplinary policy provided in the Global HR Policy. Staff should never contact the press or media as a way of drawing attention to wrongdoing in ADD.

9. Associated Policies and Guidelines

- Code of Conduct
- Child and Vulnerable Adult Safeguarding Policy
- Anti-Bullying and Harassment Policy
- Grievance Policy
- Disciplinary Policy

- Other policies as appropriate.

Monitoring the application of this policy will be undertaken by the Board. The Board will review the Policy every 2 years.

ADD international staff members will receive an appropriate briefing to ensure that they are fully aware of their rights and responsibilities under this policy. This policy will be made available to all staff members and public via ADD International's website.

Quick Reference Guide to Whistleblowing

for ADD Staff

If you are worried that something wrong or dangerous is happening at work, please don't keep it to yourself.

Unless you tell us about any concerns you may have about wrongdoing, then we may not find out about it until it's too late.

Here are some tips for you if you have a concern:

- Raise it when it's a concern – we won't ask you to prove it
- Keep it in perspective – there may be an innocent explanation
- It will help us if you can say how you think things can be put right
- Stay calm – you're doing the right thing

How to Raise a Concern about Wrongdoing

1. We hope that you will feel able to tell your line manager first.

2. If for whatever reason you are uneasy about this or your manager’s response doesn’t seem right, then you can contact one of the following:
 - Your line manager’s manager
 - Someone on the Senior Management Team (SMT) or the Country Director
 - The Chief Executive, or the Trustee Focal Point for Safeguarding or the Chair of the Board
3. If you want to talk to them in confidence, just say so. If you prefer to send details in writing, that’s fine but please tell them who you are so that they can contact you to discuss.
4. You can also send an e-mail to **safeguarding@add.org.uk**. All concerns reported via this channel will be received by Chief Executive.
5. If you want confidential advice first, you can talk to someone you trust in the organisation, or your local trade union representative if you have one.
6. If you find that your attempts to raise matters internally have not been successful, or if your concern cannot be raised internally then you can raise your concern with the relevant regulatory authority in your country. In the UK, these can be raised with the Charity Commission on 0300 066 9197 or at whistleblowing@charitycommission.gsi.gov.uk.

Contact Details for Key ADD International Staff with Responsibility for Safeguarding / PSEA

Name	Role	Designation	Email	Phone
Adil Shah	Lead Staff Focal Point	Director of Finance and Operations	adil.shah@add.org.uk	+44 7747 000 802

Sarah Dyer	Lead Trustee	Trustee Safeguarding Focal Point	Sarah@pamodzi.com.au	+61 0402 536 436
Jimmy Innes		Chief Executive	jimmy.innes@add.org.uk	+44 7881 091 717
AK Dube		Chair of the Board	akdube@samaita.co.za	+27 79 872 0325 or +27 83 284 2232

Contact Details for Country-Level Safeguarding Focal Points

Name	Country	Designation	Email	Phone
Sylvie Cordier	UK	Programme Quality Adviser	sylvie.cordier@add.org.uk	+44 7968548860
Mostaque Ahmed	Bangladesh	Programme Officer	mostaque.ahmed@add-bangladesh.org	+88 1716155868
Gnem Touch	Cambodia	MEL Manager	touch.gnem@add-cambodia.org	+855 86 66 85 95
Mohammed Gaafar	Sudan	Project Officer	mohammed.gaafar@add-sudan.org	+249 912615386
Ritha Paul	Tanzania	Head of Finance & Operations	ritha.paul@add-tanzania.org	+255 22 2780 336
Rebecca Nayiga	Uganda	Finance & Operations Manager	rebecca.nayiga@add-uganda.org	+256 782 272 480