CIUK Whistleblowing Policy

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1. Purpose

Whistleblowing is the name given to the act of disclosure of information to the employer or a relevant authority by an individual who knows, or suspects that the organisation is responsible for or has taken part in some wrongdoing.
The purpose of this policy is to encourage employees and others who have serious concerns about any aspect of the organisation's work to come forward and voice those concerns.

2. Policy

The policy is designed to ensure that you can raise concerns about wrongdoing or malpractice within CIUK without fear of repercussion and that you can have confidence that your concerns will be properly investigated and resolved in a timely manner.

The Policy aims to:

- To encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon any concerns about wrongdoing or malpractice.
- Provide avenues for you to raise those concerns and receive feedback on any action taken.
- Reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.

3. Scope

The Policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, trustees, interns, volunteers or those on work placement working on behalf of CIUK.

This policy is for guidance only and does not form part of the terms and conditions of employment. CIUK may amend this policy at any time.

4. Guiding Principles

Confidentiality and the 'need-to-know'

- Information about a Whistleblowing will only be provided to those people who need to know in order for the case to be resolved. This is called the need-to know-group and includes anyone who needs to be kept informed to enable them to fulfil their role. The need-to-know group is decided at the early stages of the process and reviewed by HR throughout in case it needs to change.

- All Whistleblowing cases will be treated as confidential to the need-to-know group unless CIUK has a duty to disclose the matter to an external regulator or other body e.g. the UK Charity Commission or a donor.

- While the Whistleblowing procedure is in progress, the case must be kept confidential by all parties involved. A breach of confidentiality could lead to disciplinary action.

- All elements of the Whistleblowing case will be processed, managed and stored in line with the applicable data protection policy.

5. Health and wellbeing support

CIUK recognises that resolving problems at work may at times be stressful and challenging. Employees may find it helpful to seek support from CIUK's Employee Assistance Provider (EAP). The EAP specialises in the provision of confidential support, guidance and advice across a range of topics.

Our EAP provider is Simplyhealth and they can be reached on 0370 908 3481.

6. Legal Jurisdiction

The applicable jurisdiction is the UK for the purpose of this policy

7. Application of this policy

Qualifying disclosures

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers in relation to CIUK's activities. Certain disclosures are prescribed by law as 'qualifying disclosures'. A 'qualifying disclosure' means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and that the employee reasonably believes shows the organisation has committed wrongdoing. The categories of wrongdoing which may constitute malpractice include the following:

- Committing a criminal offence, including theft, fraud or corruption.
- Sexual harassment, abuse or exploitation.
- Failing to comply with a legal obligation.
- A miscarriage of justice.
- Endangering health and safety of an individual.
- Environmental damage or
- Concealing any information relating to the above.

These acts can be in the past, present of future, so that, for example a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The organisation will take any concerns that you may raise relating to the above matters very seriously.

It will not always be clear that a particular situation falls within one of these categories and you will need to use your own judgment to decide whether an issue of concern amounts to suspected malpractice. We also encourage you to report other types of wrongdoing such as accepting gifts which are intended to influence decision making and deliberate disregard or serious breach of CIUK's policies and practices.

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 the Grievance Procedure. Where a concern is raised under the whistleblowing policy where it is not appropriate to do so, i.e. relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the grievance policy.

8. The Procedure

How to raise a disclosure:

In the first instance you should report any concerns you may have to your line manager/Team Head or the HR function. All concerns reported will be treated in the utmost confidence. You may submit your concerns to whistleblowing@care.org, you may submit your concerns in any format. Alternatively, you may submit your concerns to either the HR Director or, where your concern is about any member of HR you can submit this directly to the CEO. You may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

If you feel it is not appropriate to report your concerns to your line manager/Team Head or the HR team, you should take them direct to the Director of HR.

If the disclosure is against the HR department, or any member of the HR department then you should go directly to the CEO.

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. In some circumstances we recognise that 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. CIUK strongly encourages you to seek advice before reporting a concern to anyone external. The government has prescribed a list of appropriate bodies for such external reporting available here: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies. Please see section 7.7 for further information.

Following receipt of a disclosure made under this policy, a preliminary meeting will be held with the employee by a representative of HR. The purpose of this meeting is to gather as much information as possible from the employee regarding their concerns, including whether they have any supporting evidence or can identify any witnesses. This meeting will be held as soon as possible following the disclosure.

Employees may wish to be accompanied by a fellow employee, who may be an accredited trade union representative (if a member), to any meetings or discussions about the matter. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it shall take.

9. Investigation of Disclosures

If necessary, an investigating manager will be appointed to investigate the matter. The nominated investigating manager will commence a full investigation into the concerns raised and will:

- ensure that all concerns raised by staff are taken seriously;
- inform line managers, if this is appropriate;
- ensure that concerns are investigated properly, objectively and in a timely manner; and
- report on the findings and any actions proposed.

The investigation will aim to gather all relevant information including relevant, documentary evidence or witness statements. CIUK 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 from 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.

All staff called upon to assist with the investigation will have a duty to cooperate and may request that their concerns are treated in confidence. Such wishes will be respected where possible.

Where appropriate the matters raised may:

- Be investigated by management, internal audit or through the disciplinary or grievance process.
- Be referred to the Police.
- Be referred to an external auditor.
- Be referred to an independent body for investigation.
- Be referred to be investigated by an external investigator.
- Form the subject of an independent inquiry.

Following receipt of your concerns, the person investigating your concerns will:

- Acknowledge the concern has been received.
- Indicate how the organisation plans to deal with the concerns raised.
- Supply you with employee support information.
- Tell you whether any further investigations will take place.

Once the investigation is complete, the investigation manager, in conjunction with HR, will write to the employee confirming the outcome. While CIUK cannot guarantee that it will respond to your report in the way that you might wish, CIUK will try to handle the matter fairly and properly. By using this procedure, you will help to achieve this. If you are unhappy with the outcome of the investigation, or with the way the investigation is handled, CIUK would prefer that you submit another report explaining why this is the case. Your concerns will be investigated again if there is good reason to do so.

If the employee does not think this is appropriate and is not satisfied with the outcome, they may raise the matter with the appropriate official organisation or regulatory body. It is of course open for you to do so, provided that you have sufficient evidence to support your concerns. CARE International UK strongly advises that you seek advice from Protect before reporting your concerns externally. Protect (formerly Public Concern at Work) is an independent charity which can provide independent advice at any stage. Protect can be contacted online at www.protect-advice.org.uk or by telephone on 0203 117 2520.

10. Formal Action

Should formal action be required as a result of the disclosure made under this policy, this action will be carried out in line with the applicable, internal policy. Any potential sanctions imposed will be fair, reasonable and in line with the relevant policy.

This policy encourages you to put your name to your allegations whenever possible. If you chose not to let us know who you are then this does make it much more difficult for us to protect your position, or to give you feedback. This policy is not ideally suited to concerns raised anonymously.

11. Anonymous Concerns/Allegations

CIUK hopes that staff will feel able to voice whistleblowing concerns openly under this policy and does not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or even impossible without having direct access to the individual who initially raised the concern and so it is best to declare your identity if possible and the more information that you can give us, the easier it is for us to progress our investigations. However, if you want to raise your concerns confidentially, CIUK will take reasonable steps to keep your identity secret, but cannot guarantee your anonymity, including because there may be circumstances when you may be needed as a witness. Should this be the case, CIUK will seek to discuss the matter with you at the earliest opportunity.

If you want to raise a concern in confidence, please make this clear when you make your initial report so that the appropriate arrangements can be made

12. Untrue Allegations

CIUK will value and appreciate any report which is made in good faith and in compliance with this policy, even if the subsequent investigation finds no wrongdoing. If, however, a false report is made frivolously, maliciously, or for personal gain, that could lead to disciplinary action.

If CIUK's disciplinary process does not apply to you (for example, if you are a consultant), steps may instead be taken to terminate the relationship between you and CIUK.

13. Reporting your own actions

If you think that anything you have done, or anything you are about to do, may be judged to be malpractice or misconduct it is important that you consult your line manager/Team Head or the HR Department at the earliest opportunity. Again, you should do this even if you only have suspicions that this may be the case. Any concerns you have about this will be treated appropriately and with respect. Note however, that those who have been actively involved in wrongdoing will not have automatic immunity from disciplinary or criminal proceedings.

14. Support and Obligations to you:

Throughout this process:

- You will be given full support from senior management
- Your concerns will be taken seriously, and;
- The organisation will do all it can to help you throughout this investigation by allowing you to be accompanied to all meetings and discussions by a fellow employee (not connected with the investigation) or a recognised trade union representative (if a member)
- You will have access to Simply Health EAP
- Where appropriate, CARE International UK will nominate a direct contact in HR to assist you with any concerns or worries.
- CARE International UK will allow you to seek advice before reporting a concern to anyone external. The independent charity Protect, offers a free, confidential helpline- 020 3117 2520

CIUK will ensure that any actions proposed are followed through. We will also review and act on organisational learning from the issues raised. If applicable, we will also inform relevant internal stakeholders and external bodies.

15. Protection against detrimental treatment

- CIUK is committed to good practice and high standards and being supportive of you as an employee.
- The organisation recognises that the decision to report a concern is not taken lightly and we appreciate the trust you place in us when raising such a concern.
- The organisation will not tolerate any harassment, victimisation or other detrimental treatment of a whistle blower raising genuine concerns - whether the concern was raised informally or formally and will take appropriate measures to protect you.
- If you believe that you are being subjected to detrimental treatment as a result of raising a concern under this policy then you must inform HR immediately.
- Any attempt to victimise an employee for having raised a concern about malpractice, or to deter anyone from raising such a concern, is a serious disciplinary offence.