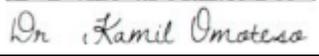


Policy: Whistleblowing

Policy number: HAPC/POL/WB

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| Responsible department/Policy Owner: | P&C |
| Date of review: | 29/10/2020 |
| Date of next review: | October 2021 |
| Associated Documents: | Process Maps Related Forms |

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|--------------------------------------|-------------|--|------------------------------------|
| Date approved by Board of Directors: | Jan 05 2021 | Signature:  | Print name: Dr Mohamed Ashmawey |
| Date approved by Board of Trustees: | Jan 09 2021 | Signature:  | Print name: Dr Kamil Omotesa |

Revision History & Summary of Changes

| Revision History Summary of changes and justification | Changes reviewed & approved by | Date of review & approval | Date effective |
|---|--------------------------------|----------------------------|----------------|
| Version 1- <ul style="list-style-type: none">Creation of Handbook | | Jan 05 2021 Jan 05 2021 | Jan 05 2021 |
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Whistle-Blowing

1. Policy Statement

1.1 Human Appeal is committed to upholding its values, and in particular acting with care and integrity, as well as legally. In some circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work. Human Appeal encourages staff, volunteers, and contractors to make disclosures as defined by this policy.

2. Policy Objectives

2.1 Human Appeal takes malpractice and wrongdoing in relation to the organisation's procedures and actions very seriously. We aim to ensure that as far as possible, our employees are able to blow the whistle and tell us about any wrongdoing at work which they believe has occurred or is likely to occur.

3. Definition of Terms

3.1. Whistle-blower – if you're a worker and you report certain types of wrongdoing. This will usually be something the employee has seen at work, though not always. The wrongdoing that is disclosed must be in the public interest. This means it must affect others, e.g. the general public.

3.1.1. A whistle-blower is protected by law – employees shouldn't be treated unfairly or lose their job because they 'blow the whistle'. The Public Interest Disclosure Act 1998 protects employees who report wrongdoing within the workplace. So, any employee or worker who makes a report under this procedure in the reasonable belief that the disclosure they are making is in the 'public interest' will not be subject to any detriment.

3.2. Qualifying Disclosures – certain disclosures qualify in law as a "protected disclosure". A "protected disclosure" means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Charity has committed a "relevant failure" by:

- committing a criminal offence, has committed a criminal offence or is likely to commit a criminal offence;
- failing, has failed or is likely to fail; to comply with a legal obligation;
- the likely occurrence of a miscarriage of justice or a miscarriage of justice has occurred;
- endangering, has endangered, or is likely to endanger, the health and safety of an individual; or,
- damaging, has damaged or is likely to damage the environment; or,
- deliberately concealing, or has deliberately concealed or is likely to deliberately conceal, any information relating to the above.

4. Roles and Responsibilities

4.1. Our dedicated department responsible for all reports made is the People and Culture department. The People and Culture personnel when dealing with concerns raised, will be addressed as the Whistle-blowing Officer.

4.1.1. The Whistle-blowing Officer will be responsible for:

- Arranging individual interviews with relevant witnesses or individuals and informing them of their right to be accompanied at the meeting by a legal advisor / trade union representative / work colleague.
- Establishing the facts/obtain statements/collect documentary evidence.
- Maintaining detailed records of the investigation process.
- Making any recommendations for action to be submitted to a more senior manager

4.1.2. Whistle-blowing Officer will have the following responsibilities towards the party against whom the disclosure is raised:

- Inform the individual/individuals about whom the disclosure is made, in writing of the disclosure, the seriousness of the allegations and provide any supporting evidence.
- Advise in writing of the procedure to be followed.
- Give the person the opportunity to respond in person and in writing to the claims made, and receive and consider any relevant evidence.
- Inform them of their right to be accompanied at any official hearings by a trade union representative / work colleague.

5. Policy Provisions

5.1. When someone blows the whistle they are raising a concern about danger or illegality that affects others. The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistle-blower rarely has a personal interest in the outcome of any investigation into their concern – they are simply trying to alert others.

For this reason, the whistle-blower should not be expected to prove the malpractice. He or she is a messenger raising a concern so that others can address it.

5.2. Individuals should in most cases, should first report their concern to their line manager, who is expected to respond to that matter. If the relevant manager cannot deal with the matter, he or she will refer the concern to the Whistle-blowing Officer. Dependent on the seriousness and sensitivity of the matter, and who is suspected of the wrongdoing, the individual can, if necessary report directly to the Whistle-blowing Officer. See Whistle-blowing Process Map.

5.3. How to raise your concerns:

5.3.1. We encourage employees to raise their concerns in writing where possible, setting out the background and history of their concerns (giving names, dates and places where possible) and indicating the reasons for their concerns. However, employees can arrange a meeting with the Whistle-blowing Officer where all concerns can be discussed.

5.3.2. After an employee has raised their concern, Human Appeal will decide how to respond in a responsible and appropriate manner. Usually this will involve making internal enquiries first but it may be necessary to carry out an investigation which may be formal or informal depending on the nature of the concern raised. The Whistle-blowing Officer will, as far as possible, keep the whistle-blower informed of the decisions taken and the outcome of any enquiries and investigations carried out. However, we will not be able to inform employees of any matters which would infringe our duty of confidentiality to others.

5.4. Protecting the Whistle-blower

5.4.1. Human Appeal will take appropriate action to protect the individual from any harassment, victimisation or bullying. Employees who raise a genuine concern under this policy will not be at risk of losing their job, nor will it influence any unrelated disciplinary action or redundancy procedures, or lead to any other detriment being suffered in relation to their employment.

5.4.2. The matter will be treated confidentially if the individual requests it and their name or position will not be revealed without their permission or Human Appeal has to do so by law. If in other circumstances the concern cannot be resolved without revealing the individual's identity, the Whistle-blowing Officer will discuss with the individual whether and how to proceed.

5.4.3 Concerns raised anonymously tend to be far less effective but the Whistle-blowing Officer will decide whether or not to consider the matter taking into account:

- the seriousness of the matter;
- whether the concern is believable;
- whether an investigation can be carried out based on the information provided.

5.5. This procedure outlines the process that employees should follow when reporting a perceived wrongdoing within Human Appeal. An employee who reports concerns in the public interest via our Whistle-blowing Policy is protected in law under the Public Interest Disclosure Act from detrimental treatment or victimisation from Human Appeal.

5.6. If you believe the concern is more serious then you should follow our Serious Incident Reporting Process. See Serious Incident Reporting Policy

6. Sanctions

6.1. We encourage employees to use the procedure if they are concerned about any wrongdoing at work. However, if the procedure is found to have been invoked for malicious reasons or in pursuit of a personal grudge, then employees will be liable to immediate termination of employment or such lesser disciplinary sanction as may be appropriate in the circumstances.