

## **Raleigh Whistleblowing policy**

### **What is Whistleblowing?**

- "Whistleblowing" is the reporting of suspected misconduct, negligence or illegal acts. For example, this may include fraud, bribery, corruption, health and safety risks, sexual harassment, bullying or victimisation.
- A "Whistleblower" is the person who raises the concern relating to any of the above.
- At Raleigh, the wrongdoing will typically be something you have witnessed, or suspect is happening/has happened while interacting with Raleigh volunteers or staff.
- If you have any genuine concerns, you should report it under this policy.
- Whistleblowing is not the same as making a complaint. People who "blow the whistle" are raising an alert about an issue that might not directly affect them. Raleigh also has a Complaints Process for people who want to raise an issue that directly affects themselves – the process can be found here: <https://raleighinternational.org/about-us/contact-us/>

### **The aims of this policy are:**

- To encourage people to internally report suspected wrongdoing 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 guidance on how to raise concerns.
- To reassure people that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

### **Raleigh is committed to:**

- treating all disclosures consistently and fairly
- taking all reasonable steps to maintain the confidentiality of the Whistleblower (unless required by law to disclose such information. If this is required, we will discuss this with the person concerned.)
- emphasising to everyone associated with Raleigh that victimisation of a Whistleblower is not acceptable. Any instances of victimisation will be taken seriously and managed appropriately
- training workers at all levels of the organisation in relation to whistleblowing law and our policy

### **What can be reported?**

- Reportable wrongdoing may have happened, be happening, or be likely to happen. For example (this list is not exhaustive):
  - serious breach of Raleigh policies and procedures;
  - failure to comply with any legal obligations or regulatory requirements;
  - safeguarding disclosure or concern;
  - fraud or theft;
  - conduct likely to damage Raleigh's reputation
  - bribery or corruption;
  - money laundering;
  - contracting with, or funding, a terrorist organisation;
  - irregularities with procurement;
  - abuse of position at Raleigh to obtain personal benefits;
  - showing undue favour over a contractual matter or to a job applicant;
  - a criminal offence or planned criminal offence;
  - deliberate and serious endangerment of an individual's health and safety;
  - incidences of bullying, harassment or discrimination;
  - unauthorised disclosure of confidential information;

- deliberate and hazardous environmental damage; and/or
- concealment of information on any of the above.

### What cannot be reported?

- Personal grievances aren't covered by whistleblowing, unless your particular case is in the public interest; these should instead be reported to a Raleigh staff member by Raleigh's internal processes.

### What is Raleigh's procedure for handling whistleblowing?

- Anyone associated with Raleigh (staff, volunteer leaders, volunteers, trainers, project partners or community members) who sees wrongdoing can report it. We hope that in nearly every situation, a report can be made to someone responsible at Raleigh – for instance a member of staff, a line manager or via an incident report. This Whistleblowing Policy also provides routes that can be used when someone feels they cannot report via the following mechanisms.
- Reports can be made from every country in which we work to:
  - [whistleblowing@raleighinternational.org](mailto:whistleblowing@raleighinternational.org) – this is monitored by the Director of Finance & Corporate Services.
  - [safeguarding@raleighinternational.org](mailto:safeguarding@raleighinternational.org) (if there is a concern that someone is at risk of harm) – this is monitored by both the Raleigh Lead Safeguarding Officer & the Deputy Safeguarding Officer – the Director of Safety & International Operational Support and the Medical Coordination Manager respectively.
  - In the countries where Raleigh works, reports can also be made to the Raleigh Country Office, specifically a senior member of staff (for instance the Country Operations Manager or Country Director) The person to contact in the UK for Whistleblowing is the Director of Finance & Corporate Services on 020 7183 1299. For Safeguarding, contact the Director of Safety & International Operational Support or Raleigh's Duty Manager on 020 3598 0650
  - In some of the environments where Raleigh works, neither email nor phone may be easily available. In those environments, a person should request a confidential conversation with a senior member of staff (for instance the Country Operations Manager or Country Director) as soon as is possible
  - If none of these is felt to be appropriate, a confidential service is available via an external organisation called Safecall. Safecall provides a 24 hour a day, 7 days a week service. Safecall can be contacted via a secure web portal: [www.safecall.co.uk/report](http://www.safecall.co.uk/report) or on the following phone numbers:

Country	Telephone Number	Freephone Y/N
Costa Rica	+44 191 516 7769	NO
Malaysia	1800 220 054	YES
Nepal	+44 191 516 7763	NO
Nicaragua	001 800 220 2355	YES
Tanzania	+44 191 516 7764	NO
UK	0800 9151571	YES

- These reports, apart from those related to Safeguarding, will then be shared with Raleigh's Head Office Whistleblowing point of contact - the Director of Finance & Corporate Services.
- Concerns should be raised as early as possible.

- Concerns may be raised verbally or, preferably, in writing or by email, giving any background and history, including relevant dates.
- If you wish to remain anonymous, that is possible; However, Raleigh does not encourage staff or volunteers to make disclosures anonymously. Proper investigation may be more difficult or impossible if Raleigh cannot obtain further information. It is also more difficult to establish whether any allegations are credible and have been made in good faith.
- If you are concerned about possible reprisals if your identity is revealed they you should come forward to one of the contact points listed in the paragraph above and appropriate measures can then be taken to preserve confidentiality.
- If you are in any doubt about process, you can seek advice from the confidential dedicated whistle-blowing email address: [whistleblowing@raleighinternational.org](mailto:whistleblowing@raleighinternational.org)

#### **What training will Raleigh provide?**

- Raleigh aims to provide training to all staff and volunteers at induction and during regular staff meetings on Whistleblowing.
- Raleigh aims to make project partners and community members aware of the contact numbers, policies and processes listed above.

#### **Investigations and Outcomes**

- Once you have raised a concern we will deal with it fairly and in an appropriate way. We will carry out an initial assessment to determine the scope of any investigation and will inform you of the outcome of our assessment. You may be required to provide further information to assist with our assessment.
- 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. If you choose not to receive direct feedback regarding your concern, you should make this clear to the person/s you speak to.
- If we conclude that you have made false allegations maliciously, or with a view to personal gain, if you are part of Raleigh you will be subject to disciplinary action.
- If you believe that your report has not been properly investigated, or that some material facts have not been taken into consideration in the investigation, you should raise your concerns with Stacey Adams, Chief Executive of Raleigh International at [s.adams@raleighinternational.org](mailto:s.adams@raleighinternational.org) , unless she is part of your report, in which case details of a trustee to contact will be provided with the initial feedback. After a second investigation, she will inform you of her decision as to what action will be taken.

#### **Notifying organisations external to Raleigh**

- The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing. In most cases you should not find it necessary to alert anyone apart from Raleigh, with the exception of the designated external third party, Safecall, if required as part of the process.
- The law recognises that in some circumstances it may be appropriate for Whistleblowers to report concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. It should be borne in mind that media organisations have their own commercial interests to pursue and are not the appropriate bodies for resolving regulatory concerns. We strongly encourage you to seek advice internally before reporting a concern to anyone not outlined within this policy.