



international  
**alert**

## WHISTLEBLOWING POLICY

CONTENTS	PAGE
INTRODUCTION .....	2
WHAT TYPES OF CONCERNS ARE COVERED BY THIS POLICY? .....	2
WHAT IS NOT COVERED? .....	2
HOW ARE YOU PROTECTED IF YOU RAISE A CONCERN? .....	2
HOW TO RAISE A CONCERN .....	3
HOW WE RESPOND TO CONCERNS .....	4
TAKING A MATTER FURTHER .....	4
DECIDING WHETHER TO RAISE A CONCERN .....	4
RELATED POLICIES .....	5
RELATED LEGISLATION .....	5
VERSION CONTROL .....	5

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## INTRODUCTION

It is the policy of Alert to conduct business in an honest and ethical manner. It is essential that **our staff, partners, and other associates** uphold the highest standards of honesty and integrity in **all of our work** - in the UK and globally. These standards are embodied in **Our Ethics; Core Behaviours** and related policy documents.

This policy provides guidance on how to raise concerns about malpractice in conduct of individuals within Alert, our partner organisations or any other organisations we are associated with.

It aims to ensure that if you want to raise any serious concerns, you can do so with confidence and without having to worry about being victimised, discriminated against or disadvantaged in any way as a result.

We maintain a continuous review of all our systems and procedures. This policy will be reviewed on a regular basis, with a maximum of three years between each review.

## WHAT TYPES OF CONCERNS ARE COVERED BY THIS POLICY?

This policy is intended to deal with serious or sensitive concerns about wrongdoing, either in the UK or in the countries where Alert operates, including the following:

- Criminal offences or unlawful acts
- Bribery
- Fraud, theft or corruption
- Abuse of position for any unauthorised reason or for personal gain
- Professional misconduct, such as deliberate disregard for Alert's policies and code of practice
- Discrimination against persons because of their race, colour, religion, ethnic or national origin, disability, age, sex, sexuality or class
- Health and safety infringements
- Unauthorised use of resources owned by Alert or any of its contractors

Your concern may be about members of staff, partners, suppliers or people who provide services to the public on our behalf.

## WHAT IS NOT COVERED?

This policy cannot be invoked to:

- Deal with serious or sensitive matters that are covered by other procedures (e.g. staff complaints relating to their employment are dealt with through our Grievance Procedure)
- Raise issues that have already been settled through other procedures

## HOW ARE YOU PROTECTED IF YOU RAISE A CONCERN?

If your allegation is true and/or made in good faith, you have nothing to fear. We understand that deciding to blow the whistle is not easy and we will do our utmost to protect you from any harassment, victimisation or bullying.

We will not reveal your name or position without your prior permission, unless we must do so by law. If this is the case, we will explain this to you at the time you raise the concern, so you can decide whether to proceed.

Any allegation you make will not influence, or be influenced by, any unrelated disciplinary action against you or any redundancy procedures that may affect you, as an employee.

If you need to give evidence in criminal or disciplinary proceedings, we will arrange for you to get advice on the process.

As an organisation headquartered in the UK, Alert is bound by the UK *Public Interest Disclosure Act (1998)*, which gives statutory protection to employees who disclose information reasonably and responsibly in the public interest and are victimised as a result.

### ***Anonymous allegations***

Because we will protect you, we encourage you to give your name when you make an allegation. Concerns raised anonymously tend to be far less effective and if we do not have enough information, we may not be able to investigate the matter fully. If you feel that you cannot give your name, we will decide whether to consider the matter. This will depend on:

- the seriousness of the matter
- whether your concern is credible
- whether we can carry out an investigation based on the information provided

### ***Malicious allegations***

If you make an allegation you believe is true, but it is not confirmed by our investigation, we will not take any action against you. However, if you make a malicious allegation that you know is untrue, we will take appropriate disciplinary or legal action against you.

## **HOW TO RAISE A CONCERN**

Any person who is aware of suspicions, allegations or actual wrongdoing by a person involved with Alert's work, either in the UK or in the countries where we operate, has an obligation to notify the Whistleblowing Officer immediately.

The Whistleblowing Officer at Alert is the Director of Finance & Operations. You can contact them in any of the following ways:

- Write to: Director of Finance & Operations, International Alert, 346 Clapham Road, London, SW9 9AP, UK. Write 'Private and confidential' on your envelope.
- Telephone: +44 (0)20 7627 6857. You can leave a voicemail message 24-hours a day. Only the Director of Finance & Operations can pick up the messages left.
- Email: [whistleblowing@international-alert.org](mailto:whistleblowing@international-alert.org).

It is best to put your concerns in writing and give as much information as possible – including any relevant names, dates, places, etc. The earlier you raise a concern, the easier it is to take effective action.

The Director of Finance & Operations keeps a confidential record of all concerns raised and the outcomes. She gives Alert's Board of Trustees a quarterly summary of all cases raised, without revealing any specific details – except where allegations of fraud or corruption are found to be substantiated.

If a concern involves the Whistleblowing Officer, or if you think this officer may be biased, the matter should be referred directly to the Chief Executive Officer, providing justification for why you believe this is the case. Write to: Chief Executive Officer, International Alert, 346 Clapham Road, London, SW9 9AP, UK. Write 'Private and confidential' on your envelope.

If a concern involves the Chief Executive Officer, the matter should be referred directly to the Board of Trustees. In such an event, please provide justification for why you believe this is the case. Write to: Chairman of the Board of Trustees, International Alert, 346 Clapham Road, London, SW9 9AP, UK. Write 'Private and confidential' on your envelope.

## HOW WE RESPOND TO CONCERNS

The way we deal with a concern will depend on what it involves. We will first make enquiries to decide whether we should carry out an investigation and, if so, how we should go about it. Your concern may be investigated by the Director of Finance & Operations and dealt with through the disciplinary process, or we may refer it to the following:

- the police
- our external auditor
- an independent investigator

If your concern or allegation can be handled under any other procedure or policy, we will pass it on to the relevant person and inform you. If we need to take urgent action, we will do this before carrying out any investigation.

The amount of contact you have with our assigned officer will depend on the nature of your concern, the potential difficulties involved, and how clear the information you have given is.

If you need to have a meeting to discuss the concern, you can be accompanied by a friend, colleague or manager in whom you have confidence and who understands clearly the need for utter confidentiality. Meetings with the assigned officer will normally take place in his/her office, but can be arranged elsewhere if preferred.

The whistleblower will be given as much feedback as is appropriate during the process and in respect of the outcome, in so far as this does not infringe on any duty of confidence.

Upon the conclusion of the investigation, the whistleblower may be asked for their opinion on how well they feel their concern was handled.

## TAKING A MATTER FURTHER

We hope you will be satisfied with any action we take. If you are not and would like to take the matter outside of Alert, you can contact the following:

- our external auditor
- the UK Charity Commission
- the police

## DECIDING WHETHER TO RAISE A CONCERN

There are common feelings or experiences that can be barriers to raising a concern. For example, sometimes concerns are not raised because: it doesn't feel like one's business to do so; it is only a suspicion without hard evidence; it might feel disloyal to colleagues or the organisation; it didn't go according to plan when it was raised previously, or other people had a poor experience of whistleblowing.

It is important to remember, however, that a whistle-blower is a *witness*, not a complainant. The role of the whistle-blower is to let the facts speak for themselves and to allow the responsible

Whistleblowing Officer to determine what action to take. We would prefer staff to raise matters sooner rather than waiting for proof – after all, it is important to consider the implications of *not* blowing the whistle too.

## RELATED POLICIES

[Ethical Framework](#)

[Dishonest Practices Policy](#)

[Equal Opportunities Policy](#)

[Core behaviours](#)

[Grievance Policy](#)

[Disciplinary Policy](#)

[Safeguarding Policy](#)

## RELATED LEGISLATION

Public Interest Disclosure Act (1998) - UK

## VERSION CONTROL

Version	Changes	Author	Date
1.1	<ul style="list-style-type: none"><li>Updated references to Director of Finance &amp; Operations</li><li>Added hyperlinks to related policies</li></ul>	Ruth Horsfall	Sep 2020