



Whistleblowing Policy & Procedure

June 2020

Policy Reference Information

Status	Final
Author/Lead	Nicola Williams
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Date of Next Formal Review	June 2021

Key Related Policies and Information

Policy Title
Fraud and Misuse
Grievance Policy
Bullying & Harassment
Code of Conduct
Disciplinary
Safeguarding
Financial Crime and Abuse
Anti Bribery

1. Introduction

- 1.1 This policy applies to all employees, volunteers and officers of the organisation. Other individuals performing functions in relation to the organisation, such as agency workers, consultants, partner staff any other Christian Aid representatives are encouraged to use it.
- 1.2 This policy is primarily for concerns or disclosures where the interest of others, or of Christian Aid, is at risk. Such concerns or disclosures are ones that the individual(s) raising the concern reasonably believes that one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:
- a criminal offence
 - the breach of a legal obligation
 - a breach of the Code of Conduct
 - a miscarriage of justice
 - a danger to the health and safety of any individual
 - damage to the environment
 - deliberate concealment of information tending to show any of the above six matters
- 1.3 When a concern feels serious because it is about a possible sexual misconduct or abuse, fraud, danger or malpractice that might affect beneficiaries, colleagues or Christian Aid, it can be difficult to know what to do. Staff may individually or collectively be worried about raising such a concern or may decide to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.
- 1.4 The policy provides an alternative route for raising concerns if they do not feel able to do so through normal line management channels or if the Representative raising the issue feels that it is sufficiently serious to escalate because there has been no progress in addressing the issue through line management.

If you do suspect someone of wrongdoing against an individual or the organisation, you are obliged to report it through your line manager, Head of Region, Department Director or through this policy. Failure to report may be in breach of your duty of care and your obligations against the organisation's Code of Conduct.

2. Christian Aid's Assurances

- 1.5 The Board, Chief Executive and Directors are committed to this policy. If Christian Aid Representatives raise a concern under this policy, they will not be at risk of losing their jobs or suffering any form of retribution as a result. Christian Aid will not tolerate the harassment or victimisation of anyone raising a concern. Rather than wait for proof, Christian Aid prefers that Representatives raise the matter of concern. Provided they are acting in good faith, it does not matter if they are mistaken.
- 1.6 Christian Aid actively promotes accountability and good practice in the workplace and wishes to ensure that concerns about suspected serious malpractice, illegal or dangerous practices can be properly raised by Representatives and addressed before the public interest is affected. Christian Aid will make every effort to thoroughly investigate and deal seriously with such concerns, raised in good faith and through the following procedure, in a fair, objective and discreet manner.

- 1.7 Confidence: With these assurances, we hope Representatives will raise their concerns openly. However, we recognise that there may be circumstances when they would prefer to speak to someone in confidence first. If this is the case, they are required to say so at the outset. If the individual chooses not to disclose their identity, the organisation will not do so without their consent unless required by law.
- 1.8 Representatives raising a concern should understand that there may be times when Christian Aid is unable to resolve a concern without revealing their identity, for example where personal evidence is essential. In such cases, Christian Aid representatives will discuss whether and how the matter can best proceed with the individual raising the concern.
- 1.9 If a Representative wishes to make an anonymous report they can do so. This may make it more difficult to look into the matter and it will always be preferable if the individual can provide a way of contacting them for more information about their concern.
- 1.10 If a Representative is unsure about raising a concern, they can get independent advice from Protect (see contact details under Independent Advice).

3. How to Raise Whistleblowing Concerns Internally

- 3.1 If the concern is about misuse of funds, the misuse of funds policy should be used in the first instance. If the concern is about sexual harassment, exploitation or abuse, the Safeguarding Policy should be used in the first instance. If, Representatives raising a concern wish to make a complaint about employment or how others or the individual raising the issue has been treated, the grievance or bullying / harassment policy should be used. This can be obtained from line managers or People Advisors. Additionally, if there is a concern about bribery, financial crime and abuse or breaches in code of conduct, please refer to these policies in the first instance.
- 3.2 The individual raising the concern does not need to have firm evidence of malpractice before raising a concern. However, we ask that the individual explains as fully as they can the information or circumstances that gave rise to their concern. The method of disclosure could be verbal. Ideally it should be in writing (a letter/email/memo) sent to whistleblowing@christian-aid.org or to one of the named persons below. For safeguarding concerns, please email safeguarding@christian-aid.org or the safeguarding trustee email address safeguardingtrustee@christian-aid.org.

3.3 Step One

Christian Aid Representatives who become aware of any criminal wrongdoing or who have serious concerns about safeguarding, malpractice, theft or fraud which might adversely affect Christian Aid's business or reputation or might otherwise put at risk the health or safety of anyone, should first raise it in confidence with their line manager or team leader. This may be done verbally or in writing.

3.4 Step Two

If the individual raising the concern feels unable to raise the matter through their line management, for whatever reason, they can either use the whistleblowing email or raise the matter with one of the following named persons:

Nicola Williams

Head of People UK, Ireland and LAC
Email: nwilliams@christian-aid.org
Phone: +44 (0) 2075232218
Interchurch House
35-41 Lower Marsh
London SE1 7RL UK

Lilian Githuka

Head of People Africa and AME
Email: lgithuka@christian-aid.org
Phone: +254204443242
All Africa Conference of Churches
Bishop Josiah Kibira Building, 3rd Floor
Waiyaki Way

Josie Oppong

Governance Manager
Email: joppong@christian-aid.org
Phone: +44 (0) 207523 2053
Interchurch House
35-41 Lower Marsh
London SE1 7RL UK

Martin Birch

Chief Operating Officer
Email: mbirch@christian-aid.org
Phone: +44 (0) 207523 2222
Interchurch House
35-41 Lower Marsh
London SE1 7RL UK

If the individual raising the concern believes there are outstanding/unresolved issues or that there has been unreasonable delay in handling or addressing the concern, they can contact Christian Aid's Chief Executive or the Vice Chair setting out what they believe the outstanding or unresolved issues are:

Amanda Mukwashi

Chief Executive
Email: amukwashi@christian-aid.org
Phone: +44 (0)207 523 2356
Interchurch House
35-41 Lower Marsh
London, SE1 7RL UK

Trustee

Email: vicechair@christian-aid.org
Phone: please use email address
Interchurch House
35-41 Lower Marsh
London SE1 7RL UK London

4. How Christian Aid will Handle Concerns Raised

- 4.1 Issues of concerns & disclosure will wherever possible be acknowledged within 5 working days.
- 4.2 Once a concern has been received it will be assessed and considered with regards to appropriate action to be taken. The process for the investigation will depend on the type of complaint being made and the policy under which it is being investigated. For example, if it is a sexual misconduct issue, the policy may be to suspend the subject of the complaint while investigation takes place.

If a named person is contacted, they will make every effort to deal with the concern in a fair & objective manner by investigating the matter as quickly as possible or nominating an appropriate person to do so.

- 4.3 This may involve an informal review, an internal inquiry or a more formal investigation. Christian Aid will tell the individual who has raised the concern details of the person handling the matter, how they can be contacted and what further assistance (if any) is required of the individual raising the concern.

- 4.4 When an individual raises a concern, it will be helpful to know how they think the matter might best be resolved. If they have any personal interest in the matter, we do ask that this is disclosed at the outset.
- 4.5 Any investigation that is deemed necessary as a result of the whistleblowing report will be performed using the appropriate policy that the matter relates to. This may involve Christian Aid staff or external resources where it is deemed appropriate. The individual concerned will be informed of the policy that the concern will be investigated under. If the concern is raised directly to a named individual, they will receive a copy of the investigation report and the recommendation on the appropriate course of action.
- 4.6 Whenever possible, the individual will be notified once an investigation has been completed. However, we are not able to tell the individual about the precise actions we take where this would infringe a duty of confidence we owe to another person.

5. Independent Advice & External Contacts

- 5.1 If you are unsure whether to use this policy or you want confidential advice at any stage, you may contact the independent UK charity Protect on 020 3117 2520 or visit their website on www.pcaw.org.uk/contact-protect-advice-line/. Their lawyers can talk you through your options and help you raise a concern about malpractice at work. You can also contact your union (where applicable) for advice.
- 5.2 Christian Aid recognises that there may be circumstances where an individual can report a concern to an outside body. In such circumstances Christian Aid would rather that such matters are raised with our regulator – the Charity Commission, than not at all. Alternatively, through Protect on 020 3117 2520 (or, if applicable, your union) will be able to advise you on such an option.
- 5.3 Contact details for the Charity Commission is:

Charity Commission of England and Wales
Tel: 0845 300 0218
Online contact through www.charitycommission.gov.uk

Additionally, a concern about a matter in Scotland may be reported to:

Office of the Scottish Charity Regulator
Tel: 01382 220446
Fax: 01382 220314
Address: Office of the Scottish Charity Regulator (OSCR)
2nd Floor, Quadrant House
9 Riverside Drive
Dundee, DD1 4NY
Email: info@oscr.org.uk

If you wish to obtain advice from our independent provider, you can contact thirtyone:eight. Telephone 0303 003 11 11 or by email at info@thirtyoneeight.org