



Whistleblowing Policy & Procedure

Owner	HR/Admin Manager
Procedure Approved by Management Team	September 2021
Policy Approved by Board	September 2021
Review date:	September 2023

Policy

1. Policy Statement

- 1.1 SCIAF is committed to being open and accountable. Stewardship and open accountability are core values in the way we work.
- 1.2 Very occasionally, as in all large organisations, a person or persons working with or for SCIAF may appear to be acting improperly, negligently or criminally. SCIAF encourages individuals, and organisations with whom it works in partnership, (who act in good faith) to report serious malpractice in accordance with the procedures set out below.
- 1.3 SCIAF will ensure that those who raise concerns of suspected serious malpractice are protected from dismissal, victimisation or any other detrimental treatment by SCIAF, provided that they follow the procedures set out below.
- 1.4 People to whom a disclosure of serious malpractice (see Section 3.4) is made should ensure that this policy and procedure is the correct one to follow in the circumstances (see Section 3.5).
- 1.5 Anyone who wishes who raise concerns of serious malpractice can also go directly to an external agency. SCIAF's website contains contact information for OSCR and Institute of Fundraising.

2. Scope

- 2.1 This policy and procedure covers everybody working with SCIAF to deliver on its mission including all staff working in Scotland and overseas, volunteers and others with whom SCIAF is working, such as partners.
- 2.2 It applies whether or not the information could be deemed to be confidential and whether the alleged malpractice is occurring in Scotland or overseas.
- 2.3 The legal scope of the Public Interest Disclosure Act 1998, on which this policy is based, covers all UK staff.
- 2.4 Staff, volunteers and all partners working jointly with SCIAF are protected by this policy and procedure to ensure consistency and transparency for all those working towards the Vision, Mission and values of SCIAF.
- 2.5 This policy and procedure protects staff, volunteers and partners working with SCIAF by ensuring that they are treated consistently and transparently in accordance with SCIAF's Vision, Mission and values.

3. Objectives

- 3.1 The purpose of this policy is to provide an effective procedure for people to raise their concerns when they believe that abuse, serious malpractice or professional misconduct has taken place, is taking place or is likely to take place. The protection outlined in paragraph 1.3 will only be given to those individuals acting in good faith.
- 3.2 “Good faith” is where a disclosure is made with honest intentions and without malicious reasons or spite.
- 3.3 It is essential that anyone connected with SCIAF who suspects or knows that serious malpractice has taken place, is taking place, or is likely to take place raises their concerns in line with the procedure described in this document.
- 3.4 The term “serious malpractice” includes but is not limited to:
- criminal activity (e.g. child abuse, fraud, theft, etc)
 - illegality (inc. negligence, breach of contract, breach of administrative law)
 - miscarriage of justice
 - danger to health and safety or the environment
 - victimisation
 - Covering up of any of the above.

4. The process

The process for people with concerns about serious malpractice depends upon the nature of their relationship with SCIAF – that is, whether they are staff, volunteers or otherwise associated with SCIAF.

4.1 Staff

In most cases staff should raise any concerns with their line manager or the line manager of the individual involved who will then report the concern to their Senior Manager. This may be done orally or in writing and should include full details and, if possible, supporting evidence.

If for some reason, (e.g. the manager may be implicated) this is not possible, they should speak to a member of the Senior Management Team.

The member of the SMT should inform the Complaints Co-ordinating Team.

4.2 Volunteers

Volunteers should raise concerns with the Volunteer Co-ordinator. This may be done orally or in writing and should include full details and, if possible, supporting evidence. The Volunteer Co-ordinator should report the concern to their Senior Manager. The Senior Manager should inform the Complaints Co-ordinating Team.

If this is not possible, they should speak directly to a member of the Senior Management Team.

4.3 Partners and others working with SCIAF

Partners and others working with SCIAF who want to raise concerns of alleged serious malpractice should in the first instance raise their concerns with the Director of Integral Human Development or the Director. This may be done orally or in writing and should include full details and, if possible, supporting evidence. The Director of Integral Human Development should inform the Complaints Co-ordinating Team.

4.4 Taking an issue forward

4.4.1 Anyone who raises concerns of serious malpractice will be protected from victimisation or any other detrimental treatment if they come forward with serious concerns, provided that they have followed the procedure and provided that concerns are raised in good faith.

4.4.2 The identity of anyone who raises concerns will be kept confidential as far as possible.

Procedure

5. Management responsibility

- 5.1 Managers have a responsibility to treat concerns raised seriously and will investigate them thoroughly in accordance with SCIAF's values and policies.
- 5.2 Managers must make themselves aware of other appropriate SCIAF's policies and procedures, such as the Safeguarding policy and procedures, and Grievance policies and procedures, and in each case decide whether one of these is a more appropriate mechanism to invoke.
- 5.3 Managers must immediately inform a member of the Senior Management Team of any allegations made.
 - 5.3.1 Where an allegation has been made against a member of the Senior Management Team, the Director must be informed. In the absence of a Director, all other members of the Senior Management Team will be informed.
 - 5.3.2 Where an allegation has been made against the Director, the Senior Management must be informed in the first instance; the Senior Management Team will then inform the Bishop President.
- 5.4 The member of the Senior Management Team receiving the allegation will appoint an individual not implicated in the complaint (either an independent manager or an appropriate external professional) to carry out a confidential investigation without delay and to report back to him/her. The urgency of the investigation will depend on the allegations and circumstances. This report will also be made available to other members of the Senior Management Team and the Director, if appropriate, and if necessary, the Bishop President.
- 5.4 The manager dealing with the allegation will endeavour to ensure that feedback is given to those who have raised the concern(s) on what action/s have been taken to address them. However, there may be circumstances where, given the confidential nature of the allegations or the material covered, it may not be possible to give feedback on actions taken.
- 5.5 Where feedback is possible this will be given as soon as possible. Some situations may be resolved promptly; others may take longer because they require formal investigation or hearings.

6.0 Protection

- 6.1 Any concerns raised will be investigated carefully and thoroughly. SCIAF will ensure that fair treatment will be followed at all times. Any person accused of malpractice will have the opportunity to put their account of events forward at the earliest opportunity. They will have the right to be accompanied at any time by a union representative.

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- 6.2 All those who raise concerns will be treated fairly and have the right to be accompanied at any time by a union representative.
 - 6.3 If someone tries to prevent an individual from making a confidential report or victimises that person for raising their concerns, SCIAF will treat this as a serious disciplinary offence which will be investigated in accordance with SCIAF's disciplinary policy and procedure.
 - 6.4 Where allegations by staff are not made in "good faith" and are found to be false or malicious, this will be treated as a serious disciplinary offence and will be investigated in accordance with SCIAF's disciplinary policy and procedure.
 - 6.5 Allegations made by volunteers that are not made in 'good faith' and are found to be false and malicious, will be treated as a serious matter, and dealt with in accordance with the Volunteer Policy.

7. Confidentiality

- 7.1 The identity of the person/s who raise concerns will be kept confidential as far as possible. If the person concerned has a personal interest in the matter they must disclose this at the outset.
- 7.2 However, due to the nature of some investigation processes it may not be possible to retain complete confidentiality. This includes situations where the police are involved, where statutory child protection procedures need to be adhered to, or when disciplinary investigations are held and individuals need to make a statement, which may be seen by third parties.

8. Anonymous reporting

- 8.1 Anonymous reporting can come in two forms. The first is where an individual sends a letter or makes a phone call to management and makes an allegation or statement without leaving their name. The second form is where an individual makes an allegation or statement to management, but wants their identity kept secret from those that they have accused of malpractice/misconduct.
- 8.2 The former is very difficult to act upon as there may be no or little corroborated evidence to substantiate the allegations. However this does not mean that there is no malpractice or misconduct. Management will decide how best to investigate the allegations to establish whether there is a case to answer.
- 8.3 SCIAF understands that some people may wish to report their concerns anonymously and accepts that this may occur from time to time. However SCIAF feels that it is more appropriate for individuals to come forward with their concerns rather than raising them anonymously. Anonymous reporting can make it difficult to clarify the issues, substantiate claims and investigate concerns properly.

9. Feedback and outcome of the investigation

If the individual is not satisfied with the response they have received they can raise the matter with the Director.

9.1 Once the investigation is complete appropriate action will be taken in accordance with SCIAF's Disciplinary Policy.