

WHISTLEBLOWING POLICY

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Author:	Director of Safeguarding
Owner:	Executive Director of People
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SECTION 1

1.1 Scope of this policy

1.1.1 This policy applies to:

Employees on UK contracts	<input checked="" type="checkbox"/>	Trustees	<input checked="" type="checkbox"/>
Employees on international contracts	<input checked="" type="checkbox"/>	Contractors	<input checked="" type="checkbox"/>
Agency Workers	<input checked="" type="checkbox"/>	Partners	<input checked="" type="checkbox"/>
Consultants	<input checked="" type="checkbox"/>	Suppliers	<input checked="" type="checkbox"/>
Volunteers	<input checked="" type="checkbox"/>	Visitors to SCUK premises	<input checked="" type="checkbox"/>
Donors	<input checked="" type="checkbox"/>	Service Users	<input checked="" type="checkbox"/>

1.1.2 Breaching this policy may result in disciplinary action.

1.1.3 Unless stated otherwise, this policy is non-contractual and does not form part of the contract of employment and it may be adapted or amended at any time. SCUK may also (acting reasonably and depending on the circumstances of each case) adapt, vary or depart from the application or implementation of this policy and procedure, including any time limits, to reflect the circumstances of each case and to reflect general principles.

1.2 Roles and Responsibilities

1.2.1 It is the duty and the responsibility of all staff and representatives to report any incidences of suspicious or inappropriate behaviour. If they feel unable to do so by the other reporting mechanisms, they can do so as outlined within this policy.

1.3 Policy Statement

1.3.1 In order to realise our ambitious goals for children, Save the Children UK must effectively respond to any harm to children, fraud, misconduct or wrongdoing by any of our staff and representatives. This means we are committed to the highest possible standards of integrity and accountability. We expect all our people to raise any concerns they may have about the conduct of others or the way we operate as an organisation.

1.3.2 Alongside Save the Children's Code of Conduct, our Whistleblowing Policy explains how we can maintain the high standards of behavior expected of all our staff and representatives.

1.3.3 That way we can help the charity to save more children's lives, fight for their rights, and help them fulfil their potential now and in the long-term.

1.4 Policy Rules

1.4.1 Save the Children UK expects its staff and representatives to report incidents or concerns that might compromise our values. We will support anyone who raises legitimate concerns.

1.4.2 Save the Children UK has [policies](#) in place to ensure that its work is conducted safely and lawfully. This policy is not a substitute for our other policies, and any concerns raised may be investigated under the most relevant policy. In some cases, staff and representatives **must** report certain matters in accordance with our policies, for example, but not limited to:

- [Anti-Fraud, Bribery and Corruption Policy](#)
- [Anti-Money Laundering Policy](#)
- [Anti-Terrorism Policy](#)
- [Safeguarding Policy](#)
- [Code of Conduct](#)
- [Data Protection Policy](#)
- [Health and Safety Policy](#)
- [Information Security Policy](#)
- [Managing Conduct Policy](#)
- [Managing Grievance Policy](#)



- [Respect at Save the Children Policy](#)
- [Safety and Security Policy](#)
- [Volunteering Policy](#)

- 1.4.3 The Public Interest Disclosure Act 1998 provides protection for workers (i.e. our employees and agency workers) who raise legitimate concerns, known as ‘qualifying disclosures’, about specified matters. A qualifying disclosure is one made in the **public interest** by a worker who **reasonably believes** that:
- a criminal offence;
 - a miscarriage of justice;
 - an act creating risk to health and safety;
 - an act causing damage to the environment;
 - a breach of any other legal obligation; or
 - concealment of any of the above is being, has been, or is likely to be, committed.
- 1.4.4 Save the Children UK recognises the Public Interest Disclosure Act 1998 does not extend the same legal protections to contractors or volunteers. Save the Children UK, however, wants to promote and encourage an open and honest environment in which concerns can be freely raised. The organisation will therefore, in so far as is possible, aim to treat all individuals making a disclosure in the spirit of the Public Disclosure Act 1998.
- 1.4.5 If staff or representatives have a legitimate concern, they are encouraged to report the matter at an early stage. They should not investigate the concern themselves. It is Save the Children's responsibility to investigate. Please see our Whistleblowing Procedures, below, on how to report concerns.
- 1.4.6 The identity of those raising their concerns will be kept confidential as far as possible. Complete confidentiality will not always be possible, but if an individual's name is to be disclosed, where possible they will be told first unless there is a legal requirement not to do so, or we are advised not to do so by the police or other authority.
- 1.4.7 Save the Children UK recognises the decision to report a concern can be difficult. We will support staff who raise legitimate concerns throughout the process of raising a concern. The **Wellbeing Team** are available to provide support. We take a zero-tolerance approach to the harassment, bullying or victimisation of staff for doing so, regardless of whether or not the concern is upheld. Your continued employment and opportunities for future promotion or training will not be affected if you raise a legitimate concern, which you reasonably suspect to be genuine, in line with this policy. Any examples of victimisation taking place will be considered a disciplinary offence.
- 1.4.8 In addition to the standard reporting procedures set out in our Whistleblowing Procedures below, Save the Children UK also provides staff and representatives with access to its **Integrity Line** on 0800 085 2563 (see 3.1.2 below). This provides the opportunity for staff to make reports anonymously. If a report is made anonymously, it is often more difficult for us to take action, so anonymous reports should not be made if there is an alternative.
- 1.4.9 Knowingly providing false information is a disciplinary offence.
- 1.4.10 Instructing someone to cover up wrongdoing is a disciplinary offence. If you are told not to report any legitimate concern in accordance with the relevant internal procedure, even by a person in authority such as a manager, you should not agree to remain silent and should report under this policy.
- 1.4.11 Save the Children UK may reasonably adapt, vary or depart from the implementation of this policy, depending on the circumstances of each case.
- 1.4.12 The Code of Fundraising Practice requires charities to have in place a whistleblowing policy and procedure to enable staff and volunteers to raise and report any concern about our fundraising practices. Fundraising practice concerns are defined in **Section 2.2**.

1.5 Feedback

- 1.5.1 If you have any questions about this policy or wish to give feedback, please contact the Director of Safeguarding.



SECTION 2

2.1 Supporting Documents

Hyperlinks below are maintained and updated by **Director of Safeguarding**.

Type of document	Supporting Documentation Links
Policies	<ul style="list-style-type: none">• Anti-Fraud, Bribery and Corruption Policy• Anti-Money Laundering Policy• Anti-Terrorism Policy• Safeguarding Policy• Code of Conduct• Data Protection Policy• Health and Safety Policy• Information Security Policy• Managing Conduct Policy• Managing Grievance Policy• Respect at Save the Children Policy• Safety and Security Policy• Volunteering Policy
Procedures/Processes	<ul style="list-style-type: none">• Anti-Fraud, Bribery and Corruption Procedures• Anti-Terrorism Procedures• Fraud Response Plan (see Anti-Fraud, Bribery and Corruption Procedures)
Guidelines/FAQs	<ul style="list-style-type: none">• Whistleblowing Guidance
Relevant Forms	<ul style="list-style-type: none">• Integrity Line Online Portal
Others	<ul style="list-style-type: none">• Save the Children's guidance on Whistleblowing• Government advice on Whistleblowing:• Protect: Public Concern at Work• Fundraising Regulator: Code of Fundraising Practice• Whistleblowing Policy – Named Persons Procedure

2.2 Definitions

Word/Term	Definition
Fundraising practice concern	Any legitimate concern that our fundraising practices breach the Code of Fundraising Practice or any relevant legislation, including concerns that any suppliers who fundraise on SCUK's behalf may be doing so.
Grievance	Grievances are concerns, problems or complaints raised by a member of staff relating to their employment and may include, for example, matters relating to their work, working conditions or relationships with other colleagues.
Named Persons	The executive directors and trustees with whom concerns can be raised under this policy. These are the Executive Director - People, Chief Executive Officer (CEO) and the Whistleblowing Trustee.
Save the Children UK's Integrity Line	Our anonymous reporting mechanism operated by the external charity Crimestoppers, on behalf of Save the Children UK. Reports to the <i>Integrity Line</i> can cover any issue and need not relate to criminal offences.
Whistleblowing	Whistleblowing matters are concerns about workplace wrongdoing that it is in the public interest to disclose. Usually, disclosures are made when internal



reporting, processes and policy have failed or been ignored. Examples may include:

- financial illegality, fraudulent activities
 - action that puts the health and/or safety of others at risk; and
 - the failure to investigate allegations of serious misconduct
-

Whistleblowing Trustee

The member of our Board of Trustees with special responsibility for whistleblowing. The current Whistleblowing Trustee is set out in the procedures, below.

SECTION 3

3.1 Whistleblowing Procedures

3.1.1 If any person feels unable to raise a concern through the usual reporting processes under the relevant policy (for instance, because they feel their concerns have previously been raised and not been acted upon), they should raise their concerns with one of the following Named Persons:

1. the Executive Director – People or (if not appropriate);
2. the Chief Executive Officer (CEO) or (if not appropriate);
3. the Whistleblowing Trustee.

The current “Named Persons” can be contacted as follows:

Executive Director of People	Pria Rai	p.raai@savethechildren.org.uk
Chief Executive	Gwen Hines	g.hines@savethechildren.org.uk
Whistleblowing Trustee	Dianna Melrose	d.melrose@savethechildren.org.uk

In general, you should refer matters to the Executive Director – People in the first instance, but, if appropriate, you should raise the concern with another Named Person.

3.1.2 If any person feels unable to report their concern to one of the Named Persons in 3.1.1 above, they should report the matter to Save the Children’s Integrity Line on **0800 085 2563** or through the dedicated online portal [here](#).

3.1.3 The Integrity Line is operated on behalf of Save the Children UK by the charity ‘Crimestoppers’, reports to the Integrity Line can cover any issue and need not relate to criminal offences. Reports to the Integrity Line can be made confidentially and / or anonymously however, Save the Children UK may be unable to progress a matter, if we do not have an attributable source. All reports to the Integrity Line will be forwarded to Save the Children, normally the Director of Safeguarding, and will be dealt with in accordance with this policy.

3.1.4 Once a concern has been received, it will be acknowledged and considered carefully. A decision will be made on whether it should be progressed in line with another policy. Where appropriate, an investigator will be appointed, who will report back to one of the Named Persons above. The investigator will be an individual who has not been implicated in the complaint. They will investigate all concerns carefully and thoroughly, including any urgent action if required. This may involve an early meeting with the person raising the concern to clarify any information.

3.1.5 Where appropriate, the outcome of the investigation will be reported back to the person who raised the concern, including any decisions not to progress a concern. In some cases, this may not be possible, for instance due to confidentiality obligations owed by us to other persons.

3.1.6 Each of the Named Persons may use their discretion to escalate the concern outside the process outlined in this policy if this is the appropriate course of action.

- 3.1.7 A person raising a concern may ask the Whistleblowing Trustee to consider a report which has already been investigated by the Chief Executive, or Executive Director - People under this policy. If this happens, the Whistleblowing Trustee will proceed as follows:
- The Trustee may only review the procedural elements of the investigation to ascertain whether a fair process has been followed;
 - The Trustee may ask the person raising the concern to set out in writing which procedural elements they are not happy with;
 - The Trustee will have no obligation to review the facts of a concern that has already been investigated unless it is appropriate to do so.

3.2 Whistleblowing Guidelines

- 3.2.1 The term 'whistleblowing' has no legal definition within UK law; however, it has been used to describe incidents where an employee (or worker) publicly discloses some alleged wrongdoing within an organisation.
- 3.2.2 The Public Interest Disclosure Act 1998 aims to promote greater openness in the workplace and, by amending the Employment Rights Act 1996, protects 'whistleblowers' from detrimental treatment, i.e. victimisation or dismissal, for raising legitimate concerns about matters in the public interest.
- 3.2.3 In providing this protection, the Public Interest Disclosure Act also reinforces the obligations of all persons we employ not to disclose to external sources any confidential information they become aware of during the course of their employment, unless they fall within the protection of 'qualifying disclosures'.
- 3.2.4 Save the Children UK provides Whistleblowing training to all staff, particularly line managers who are expected to lead by example, demonstrating they are committed to promoting a culture where disclosures are welcome. In addition, guidance documents are also available on the Staff Intranet.
- 3.2.5 This policy is intended to provide you with an avenue to raise legitimate concerns, and you are encouraged to make full and thorough use of our internal procedures. If, having exhausted these procedures, a staff member remains concerned that the appropriate action has not been taken, they may have rights to raise concerns in accordance with the Public Interest Disclosure Act 1998, by contacting certain external bodies, such as:

Statutory Bodies	Contact details
Charity Commission	whistleblowing@charitycommission.gsi.gov.uk ;
National Fraud & Cyber Crime Reporting Centre: ActionFraud	0300123 2040 or https://www.actionfraud.police.uk/
Office of the Scottish Charity Regulator	C&I@oscr.org.uk or 01382 220 446
Children's Commissioner for England	info.request@childrenscommissioner.gov.uk or 020 7783 830
Children's Commissioner for Wales	post@childcomwales.org.uk or 0808 801 1000
Children and Young People's Commissioner Scotland	inbox@cypcs.org.uk or 0131 346 5350

Non-statutory Bodies	Contact details
Fundraising Regulator	0300 999 3407
Independent Fundraising Standards and Adjudication Panel for Scotland	0808 164 2520
NSPCC Whistleblowing Advice Line	0800 028 0285 or help@nspcc.org.uk ;