



Whistleblowing Policy

Introduction

Family for Every Child seeks to conduct itself honestly and with integrity at all times. We are committed to the highest standards of openness and accountability.

We aim to ensure that we remain free from all kinds of malpractice, wrongdoing and unethical actions.

It is important to Family for Every Child that any inappropriate behaviour by employees is reported and properly dealt with. We therefore encourage all individuals to raise genuine concerns about malpractice in the workplace.

Family for Every Child is committed to providing an atmosphere where such concerns can be raised without any fear of detrimental treatment.

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

1. Scope

This policy applies to all individuals who work directly for Family for Every Child and its subsidiaries as well as all Assignees who are engaged by Family through a third party employer under an Employer of Record arrangement. Local employment legislation will always prevail where it is more beneficial than the terms of the Family policy and as detailed in employment contracts.

The policy also covers consultants, suppliers of goods, volunteers, interns and any person involved in Family for Every Child' work which has not been covered above.

Family for Every Child is a global, member-led network organisation. It is expected that all Member organisations will have established appropriate policies to enable improper behaviour by Member staff to be reported.

It is also important that all Member organisations are made aware of this policy and the channels for raising grievances, to enable them to raise grievances directly to Family for Every Child, if this is appropriate.

Family for Every Child is committed to achieving dissemination of this policy internally and aims to share it widely outside the organisation where appropriate (e.g. partners, consultants, preferred contractors, etc.)

This policy may be updated from time to time and where applicable after consultation with individuals.

2. List of Actions Covered Under this Policy

Whistleblowing is a term used to describe the action of a member of staff in informing the organisation of concerns of malpractice, improper conduct and law breaking.

The term 'malpractice' includes but is not exhaustive of:

- Fraud or corruption
- Breaches of financial regulations or policies
- Criminal offences;
- Abuse of children (physical, sexual, psychological or otherwise)
- Acts creating risk to health and safety
- Acts causing damage to the environment;
- Breaches of legal obligations (including negligence, breach of contract, breach of administrative law)
- Miscarriages of justice in the conduct of organisational/corporate processes
- The concealment of any of the above.

Difference between Whistleblowing and Grievance

This policy is not meant for raising personal grievances. It is also not meant to be a medium to raise any individual employment matters/issues. The organisation's grievance procedures as outlined in the [Grievance Policy and Procedures](#) should be used in those cases. The whistleblowing procedure is meant for raising serious concerns about malpractice or issues of public interest taking place anywhere in the organisation.

3. Principles

- Family for Every Child recognises the importance of whistleblowing. Everyone should be aware of the importance of preventing and eliminating wrongdoing at work.
- No person will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the staff member will not be prejudiced because he/she has raised a legitimate concern. Victimisation of a worker for raising a concern will be a disciplinary offence.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the worker who raised the issue.
- If misconduct is discovered as a result of any investigation under this procedure, the organisation's disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, staff members should not agree to remain silent. They should report the matter to a relevant person.

4. Procedure for raising a concern

Family for Every Child request that any concerns of suspicion of malpractice are raised in writing. This information will be recorded for investigative purposes and Family for Every Child records.

If you believe that the actions of anyone (or a group of people) working or volunteering for Family for Every Child do or could constitute malpractice you should raise the issue with your line manager, who will advise you regarding the next steps of action. When this is not appropriate because the staff member reasonably believes that the line manager is involved in the alleged malpractice in some way, the matter should be raised with the CEO.

The grievance procedures may be used if it seems more appropriate.

Only in the case of the individual having reasons to believe that one of the contact persons is involved in the malpractice, can he/she directly approach the Chief Executive.

If the concern is related to the Chief Executive, then the issue should be raised with the Chair of the Board.

Your disclosure under this policy will be acknowledged in writing, confirming that the matter will be investigated and that Family for Every Child will get back to you in due course.

4.1. Investigation

Family for Every Child undertakes to investigate all concerns about malpractice promptly and efficiently. Family for Every Child will immediately start investigations in all cases of malpractice. In most instances, there will be an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.

Investigations may be referred to/carried out by:

- A single person, nominated by Family for Every Child
- A committee
- The police if the situation so demands
- An external auditor

Within 14 days (or as soon as is reasonably practical) of receiving the concerns about a malpractice, the committee will provide a written confirmation of having received the particular concern. You may be asked to provide more information during the course of the investigation.

You will be kept informed about the course of the investigation as far as is reasonably practical and appropriate.

4.2. Outcome of the investigation

Possible outcomes of the investigation could be that:

- The allegation could not be substantiated; or
- A finding that the allegations are substantiated and constitute malpractice

Upon completion of the investigation, if the concern is found to be genuine, those responsible for the malpractice will be subjected to disciplinary action under the disciplinary procedure. If the

matter warrants it, Family for Every Child will prosecute and/or refer the matter to the police or other statutory bodies if it is necessary and appropriate.

We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.

You will receive written notification of the outcome of the investigation, though not all the details or a copy of the report.

5. Confidentiality

Every effort will be made to keep your identity confidential, at least until any formal investigation is underway. In order not to jeopardise the investigation into the alleged malpractice, you will also be expected to keep the fact that you have raised a concern, the nature of the concern and the identity of those involved, confidential.

There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If, in our view, such circumstances exist, we will make efforts to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation, the fact that you made the original disclosure, will, so far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure.

Equally, should an investigation lead to a criminal prosecution, it may become necessary for you to provide evidence or be interviewed by the police. In these circumstances, again, the implications for confidentiality will be discussed with you.

6. Anonymous Reporting

Anonymous disclosures are very difficult to act upon as there may be little or no corroborated evidence to substantiate the allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feedback or ascertain whether your disclosure was made in good faith. Family for Every Child does not encourage anonymous reporting, as it feels more appropriate for individuals to come forward with their concerns.

7. False Disclosures

Family for Every Child will treat all disclosures of malpractice seriously and will protect workers who raise concerns in good faith. However, appropriate disciplinary action will be taken in accordance with the disciplinary procedure, against any employee who is found to have made a disclosure maliciously that they know to be untrue or without reasonable grounds for believing that the information supplied was accurate. This may result in dismissal.

If an individual raises a genuine concern and is acting in good faith, even if it is later discovered that they are mistaken, under this policy they will not be at risk of losing their job or suffering any form of retribution as a result.

8. Corrective Action and Compliance

As part of the investigation into disclosures made under this policy, recommendations for change will be invited from the investigator to enable Family for Every Child to minimise the risk of the recurrence of any malpractice or impropriety that has been uncovered.

The relevant manager or Head of Team will be responsible for reviewing and implementing these recommendations in the future and for reporting on any changes required.

9. Dissemination of the Policy

To ensure full dissemination of the policy to all concerned stakeholders who come under the sphere of Family for Every Child's work, the following will be put in place:

- Policy displayed on the website
- A clause relating to this to be added in Family for Every Child's Membership Agreement, Agreements with partner organisations as well as in all consultancy contracts.
- A clause also to be included in our contracts with suppliers.

Document history

This policy will be reviewed every 3 years and updated where applicable.

Date	Document history
2014	Policy approved.
June 2019	Minor updates made to the policy - too minor to be approved by the board.
October 2022	Revision due