



## Whistleblowing Policy

Managed on behalf of Executive Director and Board by Chief Operating Officer

Approved by Board: 7 December 2019

---

### Introduction

The ActionAid whistle-blowing system aims to reinforce the organisation's commitment to its policies, values, attitudes and behaviours. The system provides an alternative channel to other reporting systems to learn of serious problems so that they can be resolved quickly. This ensures the rights of individuals and communities ActionAid works with are protected, and issues are resolved in a way that protects their dignity. Individuals should feel safe to report any misconduct by knowing their rights and be activists to change.

### Policy

This policy applies to all staff of ActionAid and those of partner organisations who are in a long-term (over one year) relationship with ActionAid. The policy covers the responsibility to report wrongful acts committed by staff of ActionAid and those of partner organisations. Wrongful acts in this sense are described as;

Financial and procedural malpractice including those relating to mismanagement, misappropriation of funds, actual or suspected fraud or abuse of authority. Any act of sexual exploitation, abuse, or harassment is also considered wrongful and is expected to be reported if committed by any staff member of ActionAid or their partners.

Under this policy, it will be a disciplinary matter if a genuine whistle-blower were to be victimised. ActionAid will take disciplinary action against anyone who retaliates against complainants. While the policy does not specifically cover ex-employees of the organisation, reports received from ex-employees will be considered for investigation. Members of staff are however encouraged to report any wrongful act whilst still in the employment of the organisation.

### Reporting responsibility

It is an obligation for all ActionAid staff to report wrongful acts or suspected wrongful acts, including sexual misconduct of any nature, in accordance with this Whistle-Blowing policy. Members of staff of partner organisations are also required to report such acts committed by ActionAid staff or their own staff in the execution of their partnership agreements. Reports can be made as follows;

### Affiliates, Associates and Country Programmers

Any employee of ActionAid or that of a partner organisation who observes any improper practice or wrongful conduct on the part of an ActionAid member of staff or of a partner organisation should report such observations to the Country Director.

Where the alleged wrongdoing relates to the conduct of the Country Director, the case should be reported to the International Director responsible for the Country.

---

## **International Secretariat**

Any employee of ActionAid who observes any improper practice or wrongful conduct at any Regional Officer or the International Secretariat should report such cases to the International Director responsible for that of office.

Where the alleged wrongdoing relates to the conduct of an International Director, the case should be reported to the Chief Executive Officer.

Where the alleged wrongdoing relates to the conduct of the Chief Executive, the case should be reported to the Head of Internal Audit.

## **Confidentiality**

Cases may be reported on a confidential basis or may be reported anonymously using the email address [whistleblowing@actionaid.org](mailto:whistleblowing@actionaid.org) which will be monitored by Head of Internal Audit. The confidentiality of the reports will be kept to the extent possible, consistent with the need to conduct an adequate investigation.

## **Handling of reported cases**

The Country Director, Head of Internal Audit or a member of the International Directors' team who receives a report will acknowledge receipt of the report within seven business days.

All reports should be properly investigated by a Committee set up by management or an internal auditor where applicable. Any investigation should be in line with Global SHEA and Safeguarding Team's Investigation Guidelines. Reported cases may also be passed to the international internal audit team, that is in line with ActionAid's values, for investigation if considered appropriate.

Upon investigation, management should take the appropriate corrective action warranted by the outcome of the investigation.

The Head of Internal Audit and the Regional Finance Coordinator should be notified of the outcome of an investigation.

For investigations carried out by the international internal audit team, a report will be made to higher authority as appropriate and corrective actions will be suggested.

If stakeholders are not happy with the outcome of a complaint made to AA, they can then bring the complaint to the Code of Conduct Committee. The final decision made by the Committee should be documented to be reviewed and used as reference in the future.

There may be occasions when external bodies such as donors and regulators (Charity Commission) will be notified of the outcome of an investigation.

The Whistle-blower would also be notified of the outcome of an investigation whenever it is possible to do so.

On an annual basis, issues raised through whistle-blowing will be tracked and reported to the Board.

ActionAid will offer support to any complainant, especially at-risk adults and children, regardless if a formal complaint is carried out, and the individual(s) can then decide if or when they would like to utilise the support.

### **False Allegations**

Any allegation which proves to have been maliciously or knowingly false will be viewed as a serious disciplinary offence. Any personal interest should be made known when raising concerns.

### **Notification**

All departmental heads and in particular human resource managers are required to notify and communicate the existence and contents of this policy to the employees of their department and all new employees respectively. This policy should be well-displayed throughout the office, as well as on the ActionAid website, to ensure it is easily accessible to members and staff. Country Directors should also ensure that long-term partners are made aware of their responsibility to report any wrongful conduct of ActionAid staff in the execution of a partnership agreement. Long term partners should be made aware of all relevant policies, tools, and details to do with any particular case.

#### Changes to This Policy

Nature of Changes	Date of Board Approval
Inclusion of SHEA and Safeguarding	7 December 2019