



## HOPE International Development Agency UK

### Whistleblowing Policy

Adopted: November 2023; Review: every 3 years

#### Key Points

The Whistleblowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct. Hope UK is committed to the highest standards of transparency, probity, integrity and accountability.

This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action ('whistleblowing') in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged.

This policy should be read in conjunction with other relevant policies e.g. the volunteer and safeguarding policy and statutory provision such as the Charity Commission's whistle blowing facility which can be accessed at [whistleblowing@charitycommission.gsi.gov.uk](mailto:whistleblowing@charitycommission.gsi.gov.uk)

#### Scope

This procedure applies to all Hope UK trustees, staff and volunteers.

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- Misuse of funds: the unauthorised use of public funds or inappropriate use of funds raised from other sources
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users
- Abuse of authority
- Other unethical conduct

#### Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. However there might be some circumstances where the nature of the investigation or disclosure means that it is necessary to disclose the whistleblower's identity. This may occur in connection with associated disciplinary or legal investigations or proceedings. If such circumstances exist, the whistleblower will be informed that their identity is likely to be disclosed. Hope UK will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person directly involved in the investigation/allegation and will only do so where this is judged essential (and justifiable) for the purposes of conducting the investigation.

There is an expectation that the whistleblower will not share with others that they have raised a concern, the nature and the details of the concern or the identity of those involved.

Hope UK will take appropriate action to protect from any reprisals, harassment or victimisation a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so.

### **Anonymous Allegations**

Hope UK encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. All allegations will be considered, however, by the Chair of Trustees and at least one other trustee, as deemed appropriate for the nature of the allegation and the need for confidentiality. In deciding whether to investigate an anonymous allegation further the following factors will be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant.

### **Untrue Allegations**

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

### **Procedure for Making an Allegation**

An allegation may be made direct to any Trustee of HOPE UK - by post to the Charity's registered address - 125 West Hill Road, London. SW18 5HN) or by email to the Chair at [chair@hope-international.org.uk](mailto:chair@hope-international.org.uk). They will consider the allegation and discuss with at least one other Trustee and then with the whistleblower. If the whistle blower wishes to proceed with the allegation it will be investigated.

### **Allegation**

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation (unless it is being made anonymously) and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

### Action on receipt of an Allegation

The investigating trustee will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation;
- The acknowledgement of the allegation;

- Any documents supplied by the whistleblower

The investigator will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the Treasurer will be informed within 5 working days of receipt of the allegation. The Treasurer will determine whether the allegation should be investigated and the method of investigation and will involve Hope Canada if this is deemed appropriate.

If the allegation discloses evidence of a situation which could be a criminal offence it will immediately be reported to the Board of Trustee Directors and a decision will be made as to whether to inform the Police. If the allegation concerns suspected harm to children the appropriate authorities will be informed immediately.

### Timetable

The whistle blower will receive an acknowledgement of the allegation in writing within 10 working days with

- An indication of how the Board propose to deal with the matter
- An estimate of how long it will take to provide a final response
- An indication of whether any initial enquiries have been made
- Information on whistleblower support mechanisms
- Indication whether further investigations will take place and if not, why not

Where the allegation has been made anonymously without any contact details, obviously HOPE UK will be unable to communicate what action has been taken.

### **Support**

Hope UK or Hope Canada as necessary will take steps within reason to minimise any difficulties which may be experienced as a result of making an allegation and to provide support or advice.

HOPE UK accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

### **Responsibilities**

HOPE UK Trustees are responsible for the operation of this procedure and for determining the administrative processes to be followed and the format of the records to be kept.

### **Monitoring**

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Board of Trustee Directors.

The Trustees will review operation of the Procedure and the register of whistleblowing allegations annually.