

WECF Whistleblowing Policy



WECF seeks to attain the highest possible levels of integrity, financial management and accountability. The organisation has adopted a zero-tolerance policy towards any form of inappropriate behaviour. Therefore WECF has adopted a range of proactive measures to prevent and deter acts of inappropriate behaviour among its staff, implementing partners, beneficiaries and service providers.

All staff are required to observe the highest standards of organisational and personal ethics when performing their duties and responsibilities. They are expected to be honest and maintain integrity in fulfilling their responsibilities and comply in full with all applicable laws and regulations, as well as the Code of Conduct of WECF.

This whistleblowing procedure is an important element for detecting corrupt, illegal practices and inappropriate behaviour and is consequently considered an essential component for achieving good governance.

1. Definition whistleblowing

Under this procedure, 'whistleblowing' is defined as WECF employees and the staff of partners, beneficiaries and service providers reporting suspected misconduct, illegal acts or failures to act in respect of WECF-related matter. The aim of this procedure is to encourage employees and others who have serious concerns about any aspect of WECF's work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within the organisation. Whistleblowing is viewed by WECF as a positive act that can make a valuable contribution to WECF's efficiency and long-term success. WECF is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in everything the organisation does. To help achieve these standards it encourages freedom of speech.

Persons who are considering raising any concerns are encouraged to read this procedure first. It explains: the type of issues that can be raised, how the person raising a concern will be protected from victimisation and harassment, how to raise a concern, and what WECF will do to follow up on a complaint.

Persons who are unsure whether to use this procedure or that want independent advice at any stage are advised to contact external person of trust or any of the offices of WECF for support. Contacts can be found on the website.

2. Aim and application of the whistleblowing procedure

2.1 Aims of the procedure

The procedure is designed to ensure that anyone can raise concerns about wrongdoing or malpractice within WECF without fear of victimisation, subsequent discrimination, disadvantageous treatment or dismissal.

It is also intended to encourage and enable anyone to raise serious concerns within WECF rather than ignoring a problem or 'blowing the whistle' concerning such issues to other parties.

This procedure aims to: Encourage anyone to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practices, provide safe channels to raise

those concerns and receive feedback on any action taken, ensure that the reporting person receives a response to their concerns and that they are aware of how to pursue them if they are not satisfied, reassure them that they will be protected from possible reprisals or victimisation if they have made any disclosures in good faith.

2.2 Scope of this procedure

This procedure is intended to enable those who become aware of any wrongdoing at WECF that impacts on another person or service, to report their concerns at the earliest opportunity so that they can be properly investigated. If a beneficiary or partner has a concern about a project or services provided to them, it should be submitted as a complaint to WECF, following the WECF Stakeholder and Complaints Procedure.

2.3 Who can raise concerns under this procedure?

Any person who witnesses a violation of the Code of Conduct is invited to report this violation. Any person to whom the Code of Conduct applies who witnesses a violation of it is required to report the violation at the earliest possible moment.

2.4 What should be reported?

Any serious concerns that a person has about service provision or the conduct of officers of WECF or others acting on behalf of WECF that: makes a person feel uncomfortable in terms of established standards; fall below established standards of practice; or are improper behaviour. These might relate to: conduct which is an offence or a breach of the law (a criminal offence has been committed or a party fails to comply with any other legal obligation), disclosures related to miscarriages of justice - racial, sexual, disability or any other form of discrimination, health and safety of the public and/or other employees, environmental degradation, unauthorised use of public funds or other assets, possible fraud and corruption, neglect or abuse of beneficiaries, or other unethical conduct. This list is not exhaustive.

3. Protecting the whistle-blower

3.1. Support for the whistle-blower

WECF is committed to good practices and high standards and to being supportive of reporting persons in any other manner. WECF recognises that the decision to report a concern can be a difficult one to make and will not tolerate any harassment or victimisation of a whistle-blower (including informal pressure) and will take appropriate action to protect the reporting person to come forward.

Throughout the process the whistle-blower will be given full support from the Board of Directors. Concerns will be taken seriously, and WECF will do all it can to assist the whistle-blower throughout the investigation. WECF will endeavour to provide appropriate advice and support wherever possible.

3.2 Confidentiality

All concerns will be dealt with confidentially and every effort will be made to not reveal the identity of the whistle-blower, should the whistle-blower wish it to remain confidential. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the disclosure without the whistle-blower's assistance. In that case the whistle-blower may be asked to come forward as a witness. If the whistle-blower agrees to this, they will be offered advice and support.

3.3 Anonymous allegations

This procedure encourages the whistle-blower to identify if possible. This enables WECF to protect the whistle-blower and to give feedback. In exercising this discretion, the factors to be taken into account include: the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from other sources. For anonymous reporting WECF makes use of an external whistleblowing point. Contact details can be found on the website.

3.4 False allegations

If a whistle-blower makes an allegation in good faith and reasonably believes it to be true, but it is not confirmed by the investigation, WECF will recognise the concern and there will be no further consequences. If, however, the whistle-blower makes an allegation frivolously, maliciously or for personal gain, appropriate action, including disciplinary action, may be taken.

4. Raising a concern

4.1 Notification procedures

Cases can be reported to the responsible manager or the integrity officer of WECF. Suspicions involving a member of the Board of Directors can be brought to the integrity advisor in the Board of Trustees. Also when a person does not feel comfortable to report to the responsible manager or integrity officer of WECF, a report can be filed to the integrity advisor in the Board of Trustees.

If the reporting person does not want to use the aforementioned notification procedures, the final option is to contact the external whistle-blower point.

In case the reporter would like to get independent advice and support while protecting their identity, they can contact the external person of trust.

Contacts of WECF's integrity officer, the integrity advisor in the Board of Trustees, the external whistle-blower point as well as the external person of trust can be found on the website of WECF.

4.2 How to raise a concern

A concern can be raised by telephone, in person or in writing. The earlier a concern is raised, the easier it is to take action. The whistle-blower needs to provide the following information: the nature of the concern and it is believed to be true, the background and history of the concern (giving relevant dates).

Although the whistle-blower is not expected to prove beyond doubt that the suspicion is true, the whistle-blower will need to demonstrate that there is a genuine concern relating to suspected wrongdoing or malpractice within WECF and that there are reasonable grounds for the concern.

The whistle-blower may wish to consider discussing the concern with a colleague first. Whistle-blowers may find it easier to raise the matter if there are two or more employees who have had the same experience or concerns.

Whistle-blowers may invite your trade union, professional association representative or a friend to be present for support during any meetings or interviews in connection with the concerns that have been raised.

5. What WECF will do

WECF will respond to the concerns as quickly as possible. Investigation of the concerns is not the same as either accepting or rejecting them. The overriding principle for WECF will be that of the public interest. In order to be fair to all employees, including those who may be wrongly or erroneously

accused, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until it becomes necessary to do so or if such becomes necessary. In certain cases, however, such as allegations of ill-treatment of others, immediate suspension from work may have to be considered. Protection of others is paramount in all cases.

Where appropriate, the matters raised may be investigated by the directors or controller of WECF, be referred to the police, be referred to the external auditor, be referred to and subjected to established child protection/abuse procedures, form the subject of an independent inquiry.

Within a week of a concern being raised, the person investigating your concern will write to you acknowledging that the concern has been received, indicating how WECF proposes to deal with the matter,

The level of contact between the whistle-blower and the person considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information. It is likely that the whistle-blower will be interviewed to ensure that the disclosure is fully understood. Any meeting can be arranged away from the workplace, if desired, and a union or professional association representative or a friend may accompany the whistle-blower to provide support.

WECF will do what it can to minimise any difficulties that a whistle-blower may experience as a result of raising a concern.

It is the task of WECF to assure that your disclosure are properly addressed. Unless there are any legal reasons why this cannot be done, the whistle-blower will be kept informed of the progress and outcome of any investigation.

7 Who is responsible?

The Executive Director has overall responsibility for the maintenance and execution of this procedure. The Integrity Officer of the staff carries the main responsibility for implementation of this policy. In case the complaint concerns the Executive Director, the Integrity Advisor of the Board of Trustees takes over responsibility.

8 Learning and external advice

This procedure is intended to guarantee proper dealing with concerns that are raised by anyone. All reports will be included in the Incident Register, which is discussed at least annually with the Board of Trustees, and annually at strategic meetings with staff and monthly at meetings of the Board of Directors. WECF aims to learn and improve its policies and procedures and will evaluate after each report if this whistle-blower policy needs to be updated.

WECF hopes whistle-blowers will be satisfied with any action taken. If this is not the case, whistle-blowers are recommended to take the matter to parties outside of WECF. This procedure does not prevent anyone from seeking legal advice.

Approved by the BOT on February 13th, 2020