

January 2021

Whistleblowing Policy

i) Purpose and scope

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. The Peaceful Change initiative believes it has a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation Peaceful Change initiative believes it can help prevent malpractice: prevention is better than cure. That is the aim of this policy. This policy applies to all staff and to all other workers within the Peaceful Change initiative including partner organisations and consultants.

By encouraging a culture of openness the Peaceful Change initiative wants to encourage employees and workers to raise issues which concern them at work. They may be worried that by reporting such issues they will be opening themselves up to detrimental treatment, or risking their job security; that is quite understandable but is not the case – all staff employed in the UK have statutory protection if they raise concerns in the right way. The Peaceful Change initiative, in good faith, extends this statutory protection to its entire staff. This policy is designed to give staff that opportunity and protection. It does not matter if they are mistaken. There is no question of staff having to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.

If there is anything you think the Peaceful Change initiative should know about, you should use the procedure outlined in this policy. By knowing about malpractice at an early stage the Peaceful Change initiative stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, you should not hesitate to 'blow the whistle' on malpractice.

Note: This policy is not the procedure for general grievances. If you have a complaint about your own personal circumstances then you should use the normal grievance procedure. If you have concerns about malpractice within the Peaceful Change initiative then you should use the procedure outlined in this policy. The Peaceful Change initiative has a separate policy dealing with anti-bribery and corruption you should report concerns about such issues using the process set out in that policy, instead of the process set out here.

The kinds of malpractice covered by this policy are:

- criminal offences (except those in relation to bribery and corruption, which should be reported using the procedure set out in the anti-bribery and corruption policy);
- miscarriages of justice;
- danger to the health and safety of any individual;
- damage to the environment;
- breach of any legal obligation (except in relation to bribery and corruption, which should be reported using the procedure set out in the anti-bribery and corruption policy);
- deliberately concealing any of the above.

ii) Our guarantee

The Peaceful Change initiative is committed to this policy. If you use this policy to raise a concern the Peaceful Change initiative gives its assurance that you will not suffer any form of retribution or detrimental treatment. The Peaceful Change initiative will treat your concern seriously and act according to this policy. You will not be asked to prove anything about the allegation you raise but you must reasonably believe that the disclosure is made in the public interest and that the information you have tends to show some malpractice.

If you are concerned about any form of malpractice, you should normally first raise the issue with your line manager or PCi contact person. There is no special procedure for doing this—you can tell that person about the problem or put it in writing if they prefer.

If you feel you cannot tell your line manager, for whatever reason, you should raise the matter with your manager's line manager. If having raised concerns, you remain concerned, or the matter is so serious that you feel you cannot discuss it with either of the two persons named above, you should raise the matter with the Finance and Operations Manager or the Chief Executive Officer via the following email: whistleblowing@peacefulchange.org

It is best to outline your concerns and provide as much information as possible – including any relevant names, dates, places, etc. The earlier you raise a concern, the easier it is to take effective action.

iii) How the Peaceful Change initiative will respond

After you have raised a concern, the Peaceful Change initiative will decide how to respond in a responsible and appropriate manner under this policy. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. External investigators may be brought in where necessary. The Peaceful Change initiative will endeavour to complete investigations within a reasonable time.

The Peaceful Change initiative will keep you informed of the progress of the investigation carried out and when it is completed. The Peaceful Change initiative will not be able to inform you of any matters which would infringe the duty of confidentiality owed to others.

iv) Raising your concern externally (exceptional cases)

The main purpose of this policy is to give employees and other workers the opportunity and protection they need to raise concerns internally. The Peaceful Change initiative would expect that in almost all cases raising concerns internally would be the most appropriate action for them to take.

However, if, for whatever reason, you feel you cannot raise your concerns internally and you reasonably believe the information and any allegations are substantially true, you can consider raising the matter with the appropriate regulator. A list of the bodies currently listed as regulators for this purpose in the UK and the areas they are responsible for is available from Protect. (Protect is a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice at <https://protect-advice.org.uk/>.) If employed outside the UK, the employee should seek external advice on the appropriate bodies within his / her country of employment.

Caution: If you have good reasons for not using the internal or regulatory disclosure procedures described above, you may consider making wider disclosure by reporting the matter to the police or to the media, for example. However, whistleblowers who make wider

disclosures of this type will only be protected (from dismissal or suffering detrimental treatment) in certain circumstances. The Peaceful Change initiative recommends that you take legal advice before following this course of action.

Those using the procedure outlined in this policy to raise a concern are assured that they will not suffer any form of retribution or detrimental treatment. Any person who victimises a bona fide whistleblower (e.g. by subjecting them to any form of detrimental treatment) will be liable to disciplinary action. Such a person is also liable to an employment tribunal claim (which may include liability for unlimited damages) brought by the whistleblower against them personally. To ensure the protection of all our employees, those who maliciously make an allegation they do not reasonably believe to be true and/or made in the public interest will also be liable to disciplinary action.

If you have any questions about the application of this policy, please contact your line manager, PCi contact person, or the Finance and Operations Manager.