

# PCi Whistleblowing Policy

## Disclosure of Malpractice in the Workplace

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Owner	CEO
Applicable to	PCi employees PCi contractors Consultants (while they are on assignment for PCi) PCi network members (Peacebuilding Professionals' Roster) PCi board members Staff and associated personnel of PCi's suppliers and partner organisations (any entity for which PCi provides financial or other resources) whilst engaged with work related to PCi

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## 1. Definitions

Within the policy the following definitions apply:

**Whistleblowing** is when a worker raises a concern with someone in authority – internally and/or externally – about wrongdoing, risk or malpractice within the organisation or our activities that affects others.

**Malpractice** includes (but is not limited to) the issues listed below:

- Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
- A failure to comply with any legal obligations
- Criminal offences
- Sexual misconduct, including sexual abuse, harassment or exploitation (see PCi Safeguarding Policy)
- Abuse or exploitation of children, vulnerable adults or beneficiaries (see PCi Safeguarding Policy as above)
- Breach of PCi policy
- Abuse of position
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behaviour
- Activity which would bring the organisation into serious disrepute
- The deliberate concealment of information relating to any of the matters listed above

Malpractice is not a complaint about the performance and behaviour of a manager or other work colleague towards you. If you have a complaint about your own job or employment then you should continue to use PCi's Grievance procedure.

## 2. Core Principles

It is vital that everyone who works for us maintains the highest standards of conduct, integrity and ethics, and complies with local legislation.

If an employee, volunteer, partner, consultant or contractor has any genuine concerns about malpractice in the workplace, we wish to encourage them to communicate these without fear of reprisals and in the knowledge that **they will be protected from victimisation and dismissal.**

If you have a genuine concern and have a reasonable belief it is in the public interest, even if it is later discovered that you are mistaken, under this policy you will not be at risk of losing your job or from suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously may have disciplinary action taken against them.

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. We believe we have a duty to identify such situations and take the appropriate measures to remedy the situation. By encouraging a culture of openness within our organisation we believe we can help prevent malpractice: prevention is better than cure.

## 3. PCi guarantee on whistleblowing

We are 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. We will treat your concern seriously and act according to this policy. You will not be required 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 shows some malpractice.

## 4. PCi whistleblowing policy

If you genuinely believe that the actions of someone who works for or on behalf of PCi could lead to or has resulted in malpractice, please follow the procedure below:

### 4.1 Reporting your concern

Raise the matter with your line manager, who will consult with the appropriate contact point.

If you feel you cannot tell your line manager, for whatever reason, you should raise the matter with your manager's line manager. If 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](mailto:whistleblowing@peacefulchange.org)

At the point of raising a concern it would be useful for you to share information describing:

- Whether anyone is at immediate risk of harm
- What happened. If possible make note of dates, times, places, people
- Who is involved
- How you know about it
- When you were you first concerned about it
- If you have told anybody about it
- If any action was taken

The earlier you raise a concern, the easier it is to take effective action.

In extreme circumstances where you feel that you cannot make the complaint directly you may raise the concern anonymously. You are strongly encouraged not to make anonymous disclosures as details and further concerns cannot then be checked with you and this may seriously limit the ability of investigators to pursue your concerns. Nonetheless, all disclosures, made anonymously or otherwise, will be reviewed, but lack of information may limit the nature, extent and outcome of the investigation.

#### 4.2 How PCi will respond

When receiving a report of a concern under this policy all managers should:

- Report incidents of theft, fraud, or corruption immediately to PCi's Finance and Operations Manager
- Report Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any PCi representative to PCi's Safeguarding lead
- Report any other incidents of malpractice in the workplace to PCi's Finance and Operations Manager, or to PCi's HR advisors

A decision will be made on whether it is appropriate to handle such complaints under this policy. Where not appropriate the complainant will be informed and their permission sought to divert the issue to the appropriate HR procedure.

After you have raised a concern we 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 will be brought in where necessary. We will endeavour to complete investigations within a reasonable time.

When matters are related to fraud or corruption PCi's Fraud and Corruption policy will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

When matters are reported to the Safeguarding lead, PCi's Safeguarding Investigation Guidelines will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

The issue may also be reported to the police if a criminal offence, such as fraud or theft, or sexual assault has been committed.

You will be notified once the matter has been resolved, but outcomes are subject to confidentiality and may not be communicated.

### 4.3 Raising your concern externally (exceptional cases)

This policy is intended to give staff the opportunity and protection they need to raise concerns internally. We expect that in almost all cases raising concerns internally will be the most appropriate action.

However, if 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 or external body.

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/.](https://protect-advice.org.uk/)) If you are employed outside the UK you should seek external advice on the appropriate bodies within your country of employment.

The Charity Commission also has information available on how to report serious concerns directly to them at <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

In addition, staff or anyone working on FCDO funded projects can immediately report all suspicions or allegations of aid diversion, corruption, fraud, money laundering, counter-terrorism finance, or safeguarding concerns on FCDO funded projects to the Counter Fraud and Whistleblowing Unit (CFWU) at:

[reportingconcerns@FCDO.gov.uk](mailto:reportingconcerns@FCDO.gov.uk)

+44 (0)1355 843747

Reports can be made anonymously and without fear of recrimination.

If you have good reasons for not using the internal or the regulatory disclosure procedures described above, you may want to consider making wider disclosure, for example by reporting the matter to the police or to the media. However, whistleblowers who make wider disclosures of this type will only be protected (from dismissal or suffering detrimental treatment) in certain circumstances. We recommend that you take legal advice before following this course of action.

## 4. Disciplinary actions

Anyone using the procedure outlined in this policy to raise a genuine concern will not suffer any form of retribution, detrimental treatment or disciplinary action.

We will take appropriate action, which may end in dismissal, in accordance with the relevant procedure, against any employee, staff member or consultant who:

- Has been found to be victimising another individual for using this procedure, or deterring them from reporting genuine concerns under it.
- Made a disclosure maliciously that is known to be untrue or without reasonable grounds for believing that the information supplied was accurate.