

World Vision UK

Whistleblowing Policy

Functional owner:	Chief People Officer	Prepared by:	Safeguarding Manager
Approved by:	The Board of Trustees	Effective date:	June 2022
Version:	4	Review date:	June 2025 Unless legislation or business need requires amendment before
Alignment with WVI (World Vision International) Policy:	This policy is aligned with WVI Management Policy Integrity and Protection Hotline (Whistle bower) dated 7 October 2009 and revised May 2013		

Template effective January 2022

Copyright © 2022 World Vision UK. All Rights Reserved

This document is the property of WORLD VISION UK. Dissemination, distribution, copying or use of this document in whole or in part outside of WORLD VISION UK is prohibited without the express permission of the functional owner

WHISTLEBLOWING POLICY

1. Overview

This policy aims to inform and direct any person to report evidence of Malpractices and allegations of Misconduct in a confidential manner. It allows any person to raise concerns they feel unable to direct to their line manager or using World Vision UK's complaints process and to report them in a confidential or anonymous manner without fear of reprisal or retaliation and in the knowledge that they will be taken seriously and investigated.

2. Scope

This policy is for any person working with or for World Vision UK, this includes employees, consultants, contractors, partners, volunteers, interns, and trustees. Additionally, this policy is available as a reporting mechanism to all beneficiaries, donors, sponsors, visitors, consultants, contractors, and partners of World Vision UK. It encourages disclosures to be made in the public interest without restriction or repercussion.

3. Definitions

Malpractices and Misconduct – conduct that constitutes a criminal offence, failure to comply with legal and regulatory obligations, injustice, health and safety danger, environmental risk, or a concealment of any of these. Failure to comply with a World Vision UK policy or breaches of the World Vision UK Code of Conduct or Behavioural Protocols may also constitute misconduct.

Protected disclosure is when the Whistle-blower reasonably believes the activity involves a criminal offence or a breach of legal obligation. A disclosure will not qualify if the Whistle-blower commits an offence by making the report, or if the information is subject to legal professional privilege (or a claim to confidentiality between a client and professional legal adviser in Scotland).

Whistleblowing is the raising of a concern in good faith about a risk of malpractice and misconduct.

WVUK is World Vision UK.

4. Cross References

This Policy is supported by:

Template effective January 2022

Copyright © 2022 World Vision UK. All Rights Reserved

This document is the property of WORLD VISION UK. Dissemination, distribution, copying or use of this document in whole or in part outside of WORLD VISION UK is prohibited without the express permission of the functional owner

WVUK Anti-Fraud Policy

WVUK Code of Conduct

WVUK Data Protection Policy

WVUK Dignity at Work Policy

WVUK Disciplinary Policy

WVUK Grievance Procedures

WVUK Safeguarding Policy

WVUK Serious Incident Policy

The Public Interest Disclosure Act 1998 (PIDA) governs whistleblowing. The PIDA came into force on 2 July 1999. It amends the Employment Rights Act 1996 and protects workers against dismissal or other penalties for making a 'protected disclosure'.

5. Policy

This policy is intended to address matters of a serious nature relating to Malpractice and Misconduct by World Vision UK or its employees and associates. World Vision UK provides and promotes the Integrity and Protection Hotline operated by a third-party vendor with multilingual support, for anyone to access by email or phone twenty-four hours of the day, as the mechanism to use for reporting any allegations of Malpractice and Misconduct.

An allegation must be made in good faith and not from personal motives.

All allegations will be rigorously investigated. World Vision UK will take appropriate action where claims of unlawful or unethical behaviour are substantiated. Confidentiality with respect to the identity of the Whistle-blower and the information revealed will be maintained as far as practicable, but this may not always be possible depending upon the circumstances of the case. Where it is not possible to keep details of the case confidential, the Whistle-blower will be informed of this and the reasons why. World Vision UK provides its assurance that no Whistle-blower who makes a bona fide report under this Policy will be subjected to any detriment by World Vision UK because of making a whistleblowing disclosure.

5.1 Allegations Covered

Template effective January 2022

Copyright © 2022 World Vision UK. All Rights Reserved

This document is the property of WORLD VISION UK. Dissemination, distribution, copying or use of this document in whole or in part outside of WORLD VISION UK is prohibited without the express permission of the functional owner

- Violation of a legal or regulatory obligation (including in relation to human rights);
- Fraud (deliberate and deceptive acts with the intention of obtaining an unauthorised benefit, such as money, property, or services, by deception or other unethical means);
- Corruption and bribery;
- Endangering someone's health and safety, including bullying and harassment, and sexual harassment;
- Sexual exploitation and abuse (including the use of sex workers);
- Discrimination (including discrimination based on race, ethnicity, religion, gender, and sexual orientation);
- Breach, violation, or conflict of interest in relation to World Vision UK's Code of Conduct and Behaviour Protocols;
- Breach of World Vision UK's Ethical Policy or Data Protection Policy;
- Actions perceived as unethical;
- Harm or damage to World Vision UK's reputation, operations, governance, or anything otherwise detrimental to its interests;
- Damage to the environment;
- Modern Slavery;
- Deliberate covering up of evidence that shows that any of the above have occurred.

To report an allegation by phone or online, **Freephone 08000328483** or e-mail www.worldvision.ethicspoint.com

An allegation should contain as much information as possible, including the name of persons involved, dates, times, locations, facts relevant to urgency, documentation, witnesses, and any supporting evidence.

5.2 Investigation

All allegations of misconduct will be promptly acknowledged and recorded by the independent third party. This will generate an electronic report which will be received by World Vision UK's Safeguarding Manager and Chief People Officer. Allegations will be consistently and fairly investigated. The Chief People Officer will appoint an appropriate individual to undertake the investigation. Any individual who has been implicated will be informed, as appropriate, of the investigation and given the opportunity to provide evidence. All investigations will be confidentially documented and shared as appropriate with World Vision UK's Strategic Leadership Team and Trustees, so that the necessary corrective action can be taken. Upon conclusion of the investigation the reporter will be informed that the process has been followed and completed. Should the matter concern

Template effective January 2022

Copyright © 2022 World Vision UK. All Rights Reserved

This document is the property of WORLD VISION UK. Dissemination, distribution, copying or use of this document in whole or in part outside of WORLD VISION UK is prohibited without the express permission of the functional owner

the Chief People Officer the Safeguarding Manager would take charge of the investigation process.

5.3 Allegations of misconduct

Matters of discrimination, bullying or harassment, perceived unfair treatment by a line manager, complaints about the work environment, and issues concerning pay or benefits will be handled through the Grievance Procedures or Dignity at Work Policy and should be referred to the People & Culture department. Safeguarding concerns should be reported in accordance with World Vision UK's Safeguarding Policy. Only if a person does not believe these allegations have been fully investigated should they then be submitted through the Whistleblowing procedure.

5.4 Training & Awareness

All employees will receive information and training that will inform and direct them to this policy and how to access the Integrity and Protection Hotline. External partners, contractors, consultants, supporters, and beneficiaries can access this via the World Vision UK website.

6. Data Protection

World Vision UK complies with its obligations under the Data Protection Act 2018.

A whistle-blower report will result in personal data being processed during the investigation that is undertaken following a whistleblowing report being made. The processing may include the whistle-blower's personal data and that of any witnesses, the reported individual and other persons connected with the disclosure. World Vision UK will be the controller of such data, within the provisions of UK GDPR (General Data Protection Regulation). Confidentiality and protection of personal data will be maintained within the provisions of UK GDPR.

World Vision UK will process personal data relating to whistleblowing under the lawful basis of Legal Obligation or Legitimate Interest for the purpose of the UK GDPR.

7. Non-compliance

Appropriate disciplinary action will be taken against any employee who violates this policy, for example, by violating a whistle-blower's anonymity or engaging in retaliation against a whistle-blower or where a disclosure was made in bad faith.

If it should become clear that the procedure has not been invoked in good faith, for example for malicious reasons or to pursue a personal grudge against another person, this will constitute misconduct and may be dealt with in accordance with the terms of World Vision UK's Disciplinary Policy.

8. Reporting and Monitoring

The investigation report will contain a clear description of the alleged incident or issues, corrective action already taken or advised, an assessment of potential risk to the organisation and proposed mitigation, a conclusion and further implications or reporting to statutory authorities (including any obligation to report to the relevant authorities where criminality has been uncovered).

Where it is believed that a 'Serious Incident,' as defined by the UK Charity Commission, may have taken place the matter will be escalated according to World Vision UK's Serious Incident Policy.

The number of whistleblowing cases will be reported by the Chief People Officer to the Board of Trustees.

9. External

World Vision UK would expect that in almost all cases, raising concerns internally would be the most appropriate action. However, further recourse can be sought from:

the Charity Commission by contacting it on
whistleblowing@charitycommission.gov.uk or 0300 066 9197; or

the Fundraising Regulator by contacting them on:
www.fundraisingregulator.org.uk/complaints/make-complaint

10. Document control

Template effective January 2022

Copyright © 2022 World Vision UK. All Rights Reserved

This document is the property of WORLD VISION UK. Dissemination, distribution, copying or use of this document in whole or in part outside of WORLD VISION UK is prohibited without the express permission of the functional owner

Version	Approved by	Date	Detail
2013	<i>ORCom</i>	June 2013	New policy
2016	<i>ORCom</i>	June 2016	Revised policy
2019	<i>ORCom</i>	June 2019	Updated policy
2022	<i>FARCom</i>	June 2022	Updated policy

Template effective January 2022

Copyright © 2022 World Vision UK. All Rights Reserved

This document is the property of WORLD VISION UK. Dissemination, distribution, copying or use of this document in whole or in part outside of WORLD VISION UK is prohibited without the express permission of the functional owner