

Whistleblowing

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1 Policy Statement

INTRAC aims for the highest possible standards of ethical conduct in all of its activities and expects the conduct of its Staff (defined here as including all full time and part time paid employees, contracted consultants and volunteers) to reflect this. INTRAC expects honesty, openness and mutual accountability in all its dealings with Staff. Dishonesty of any kind will be treated as a serious matter.

INTRAC encourages its Staff, business partners and members of the general public to raise concerns that they may have about any wrongdoing at any level within the business. Wrongdoing in this context means: any breach of a legal obligation or criminal offence; fraud, corruption and bribery; risk to health and safety (including all forms of harm, abuse, neglect and exploitation); damage to the environment; safeguarding; and conflicts of interest or non-compliance with internal policies.

Anyone raising a concern or reporting an incident under this policy is assured that it will be taken seriously and will be treated with discretion.

INTRAC will take all reasonable steps to handle concerns or reports of incidents confidentially, and ensure that no person under its control engages in reprisal of any form.

2 INTRAC's whistleblowing commitments

All personal data including all persons' data who are mentioned in a recorded incident or concern will be protected in accordance with General Data Protection Regulations, 2018.

If you raise an incident, concern or complaint, INTRAC will make every effort to keep your identity as confidential as possible during the investigation. You may assume that only INTRAC Staff investigating the wrongdoing will know your identity.

However, there may be circumstances (for example, if your report becomes the subject of a criminal investigation) where you may be needed as a witness and, once the investigation is complete, the findings may need to be communicated to the individual(s) concerned. Should this be the case we will discuss the matter with you at the earliest opportunity.

Staff who raise a concern or report an incident under this policy are entitled not to be subjected to any detriment as a result. Even if your concern proves to be unfounded you will be protected against any reprisals from your manager, colleagues or any other employee of the business. Making a deliberately false allegation, however, against INTRAC, a fellow employee or any other person will be treated as an act of gross misconduct which will usually result in dismissal.

If you are the subject of an allegation of wrong-doing then you will be informed of the allegation and given every opportunity to explain the situation and put your side of the story. Disciplinary action will only be taken following a full investigation in accordance with the disciplinary procedure.

3 Raising and responding to concerns

How to report an incident or raise a concern?

Anyone can report an incident or raise a concern to INTRAC about any wrongdoing they have experienced or witnessed. Concerned parties who are not Staff should use the whistleblowing email address to report their concerns whistleblowing@intrac.org

For employed Staff, any initial report or concern should be raised following the grievance policies laid out in section 6.4 of INTRAC's Staff handbook. If this is not possible or is inappropriate because of the seriousness of the concern then you should follow the Whistleblowing process outlined in section 1.5 of INTRAC's Staff handbook and report the issue to the Finance and Admin Director. However, if this is not appropriate then you should contact the Chief Executive or Board Chair who will ensure that your concern is properly addressed.

Other Staff, e.g. external consultants, should follow a similar process, initially raising the concern with their line manager or the Finance and Admin Director, escalating to the Chief Executive or the Board Chair if it is inappropriate to involve the Finance and Admin Director or Chief Executive. If it concerns the Board Chair it should go to the Deputy Chair, Treasurer or another trustee.

If it is not possible or appropriate to direct concerns to an individual within the organisation then you can raise your concern by email, sending it the dedicated email address of whistleblowing@intrac.org. Incoming concerns will be monitored by the Finance and Administration Director. If your concern relates to the Finance and Administration Director, you are asked to contact with the Chief Executive or Board Chair directly.

INTRAC does not currently have a dedicated telephone line but we are investigating options.

If you are aware that an allegation is made against you, then you must inform your manager immediately. You should create a signed and dated record of the details as you know them and send a copy of this to the Finance and Administrations Director, who will initiate an investigation.

If you need independent support during this process then you may find the following resources helpful

- [Whistleblowers UK](#)
- [Charity Commission whistleblowing support](#)
- [NCVO Whistleblowing advice](#)
- [Protect](#)

What form should an incident report or raising a concern take?

INTRAC would prefer you to give your name and contact details when you raise a concern or report an incident. However, subject to any legal constraint, INTRAC will receive anonymous concerns and undertakes to investigate these with equal rigour.

Concerns or incident reports should ideally consist of the following details:

- detailed facts (when, where, what, who is involved);
- documented evidence, if any;
- name, contact details and availability of the person raising the concern, so investigators can follow up with them as needed.

4 INTRAC's response and disciplinary procedures

Immediate handling

When an incident or concern has been raised, it will be referred immediately to the Finance and Admin Director.

Where the person raising a concern has provided contact details, an acknowledgement will be made using an appropriate means of communication as soon as possible.

Specific measures for the immediate handling of safeguarding concerns are detailed in INTRAC's Safeguarding Policy.

Concerns about INTRAC's Staff

Where the incident or concern is levelled at a member of INTRAC's Staff, has been investigated and found to be valid, disciplinary procedures as set out in INTRAC's Employee Handbook will be followed.

Confidentiality must be maintained throughout the process by all Staff and witnesses. Breaches of confidentiality will be treated as gross misconduct and subject to disciplinary action up to and including termination of employment.

The Finance and Administration Director will ascertain and comply with any legal, regulatory and contractual obligations to report suspected cases of wrongdoing, including to the police and other statutory authorities for criminal investigation.

Concerns about INTRAC's Partners

If INTRAC receives a concern or report about a partner organisation, INTRAC will advise them of the report and require them to respond quickly and appropriately.

If the outcome of the partner's investigations is that wrongdoing has occurred, ongoing work with the partner cannot involve the individual(s) concerned.

If there is reason to believe that an allegation of wrongdoing has been dealt with inappropriately by a partner, then INTRAC will consider terminating the relationship.

Concerns where INTRAC Staff or partners are not involved

Where the concern does not involve INTRAC Staff or partner Staff, the Finance and Administration Director will take reasonable steps to ascertain who should be advised of the allegation and pass the information on to them. Where appropriate INTRAC will also inform legal and regulatory authorities.

5 Training

Overall responsibility for ensuring that Staff understand whistleblowing policy and how to report concerns lies with the Chief Executive.

6 Definitions of Terms Used in the Whistleblowing Policy

"Staff" is used throughout the Whistleblowing Policy as a collective term referring to paid employees, contracted consultants and volunteers, working on either full time or part time basis.