

HALO Trust Whistleblowing Policy

1. **Introduction.** Every HALO employee, whether international, or national staff, is expected to report, or 'blow the whistle' on anything they witness, which they consider to be inappropriate, reckless, illegal, or otherwise in contravention of HALO's Values and Standards¹. Those who choose not to report incidents could be considered complicit. The Staff Grievance Procedure and External Complaints Policy² are extant, but distinct from HALO's Whistleblowing Policy.

2. **Definition. Whistleblowing is the act of raising a concern about any wrongdoing (including financial impropriety).** Sharing information, or talking through *any* concern, can be the first step towards helping HALO prevent harm, support victims, investigate failings, discipline offenders and protect our reputation. Examples of wrongdoing which must be reported are:

- a. Standing Operational Procedure (SOP) breaches, or shortcuts, which negligently expose individuals (staff, or beneficiaries) to danger.
- b. Any act (or serial behaviour) involving the sexual abuse, bullying, or harassment of a member of staff, or beneficiary.
- c. Corruption, the financial exploitation of a beneficiary community, or any other financial impropriety.
- d. Toxic leadership – leading through fear, cruelty, or any behaviour which runs contrary to HALO's culture/ ethos, or Values and Standards.

3. **Whistleblowing Options.** Enclosure 1 explains how reports should be made, or escalated, and the three approaches are below. *The whistleblower's privacy, and the confidentiality of their report (or case) will be protected, whatever the approach.*

- a. **The Chain of Command.** Wrongdoing of any sort should *usually* be reported to the chain of command. Leaders in HALO are selected because they have the character and skills to take responsibility, support their subordinates and do the right thing. Whistleblowers should be confident in their chain of command and are routinely expected to use it.
- b. **Senior Management.** Whistleblowers may feel that the severity of the issue they have identified, or witnessed, warrants immediate Director-level intervention. They might also lack trust in their immediate superiors. In such circumstances they can and should approach *any* member of HALO's Senior Management with the matter they wish to report.
- c. **HALO Whistleblowing Service – 'Safecall'.** If the Chain of Command, or Senior Management should not receive a report (if for instance the chain of command is thought to be involved in the wrongdoing), Safecall should be contacted by phone or on the web. The Service should also be used if individuals feel that they want to be *completely anonymous* to HALO's chain of command.

¹ The HALO Trust Values and Standards are published as part of HALO's policy framework.

² This policy covers the process through which a third party, or member of a beneficiary community, can make a complaint against HALO.

d. **The Trustees.** Should the methods above fail, or be in any way considered inappropriate, employees of HALO also have the freedom to report their concerns direct to the Chairman, or to other trustees on the Board.³

4. **Safecall Report.** Enclosure 3 explains Safecall's procedures. Safecall will record each report and pass it to HALO's Whistleblowing Officer through a fully secure web portal. Director HR is HALO's Whistleblowing Officer and will be employed as such unless she is accused of the alleged wrongdoing.

5. **Investigations.** All whistleblowing reports will be investigated, with either Director HR, or Head Safeguarding in the lead, unless the issue is operational, in which case Director Capability, or Director Programmes will lead. The whistleblower will be updated on progress and the outcomes. If he/ she used Safecall anonymously, updates will be available through the Whistleblowing Service.

a. **Subjects of Whistleblowing Complaints.** Anyone who is the subject of a complaint will be told that an allegation has been made against them at an appropriate point in the investigation; the subject's employment and legal rights will be protected throughout.

b. **Results of Investigations and Lessons Learned.**

(1) The results of any investigation will be briefed to the CEO, who will determine what action needs to occur. The whistleblower and subject(s) will be kept informed throughout the process, without prejudice to the result.

(2) HALO is a 'learning organisation'. Lessons (those that can be generally released) will be captured and published for HALO's internal use once an investigation has concluded; lessons which have Sector-wide utility will be released through the Charity Commission and/ or the equivalent national bodies (such as the OSCR). SOPs will be amended as necessary to ensure that HALO's procedures remain agile and consistent with lessons learned.

6. **The Whistleblower's Rights.** Employees who whistleblow are absolutely protected under law⁴. Where any mistreatment, or reprisal against a whistleblower is proven, disciplinary action will be taken against the perpetrator and a criminal investigation could ensue.

7. **Reporting Responsibilities.** Honesty and Integrity are key HALO Values. The first duty of a whistleblower is therefore to be certain that, *to the best of their knowledge and belief*, the report is true; if there is uncertainty it must be explained as such. There will be no penalty if a wrongful allegation is made in good faith, but action will be taken against any member of HALO proven to have made deliberately false, or vexatious claims. A whistleblower should record and report:

a. What is alleged to have happened and when/ where.

b. Who has been affected by the case, or incident and what their condition is.

³ The UK Board collective email address is: ukboard@halotrust.org; the Chairman's (Tim Church) email address is tim.church@tiebe.co.uk; he can also be called on +44 (0) 7768 773953. Other trustees who might be approached are: Anthony Bird anthony.bird@rothschild.com; Jane Davis janedavis55@tiscali.co.uk; Paddy Nicoll paddy@commonbarn.com; Paddy Beeley pbeeley@eleonora.com; Rupert Younger rupert@ukyoungers.co.uk; Nima Elbagir nima.elbagir@cnn.com; Mark Aedy mark.aedy@moelis.com; and Gemma Mortensen gemma@moreincommon.com.

⁴ The legal framework varies from country to country, but many have employment laws, which respect and protect whistleblowers. The UK legislation is the Public Interest Disclosure Act 1998; US legislation comes under the Whistleblower Protection Act 1989.

- c. Who else witnessed the event, who is aware and what has been done about it.
- d. Who else knows that the whistleblower has reported the matter and what are the whistleblower's wishes concerning their anonymity.

Enclosures:

- 1. CEO Letter to All HALO Staff.
- 2. Safecall – HALO Poster.
- 3. Safecall – Procedure and Frequently Asked Questions.



If you witness any inappropriate behaviour, or wrongdoing you must *Speak up*:

- Talk to your line manager
- If necessary speak to HALO's senior management, or to a HALO trustee
- If you are uncomfortable with any of these options, **contact Safecall**

0800 915 1571

or report on line at: www.safecall.co.uk/report

All calls are treated confidentially by Safecall and you may remain anonymous if you wish.



Be Bold Speak up!

Who are Safecall?

Safecall is a completely independent company that operates a confidential reporting service for many global businesses and it is available 24 hours a day, staffed by highly skilled professional call handlers. Our offices are based in the UK and you can reach us 24/7, 365 days of the year via the telephone number listed below.

How does it work?

There are two main ways you can contact Safecall: by telephone or by sending a report to Safecall's website (see below for details). When you contact Safecall by telephone you will be asked by the call handler to explain your concern in as much detail as possible. During this time he, or she, will take notes and may ask you questions based on the account you give. Once complete, Safecall will send a written report to senior management at HALO.

Can I remain anonymous?

Yes. If you do not tell Safecall who you are they will not know your identity. Even if you make a mistake and accidentally tell Safecall your name they will not pass it on. Also, Safecall do not audio record any of the calls, which helps protect the identity of anonymous callers.

What can be reported?

The service is available to receive reports on any wrongdoing, which includes: fraud, security, health and safety, data breaches, bullying, bribery, corruption, dishonesty, harassment, victimisation, or any other issue that you feel is unacceptable in the workplace.

Who will receive my report?

When a report is received by Safecall, it will be sent to HALO's Whistleblowing Officer, who is Director HR, unless she is the subject of the report. An investigation will then follow; anonymity will be protected throughout.

How to contact Safecall



0800 915 1571



www.safecall.co.uk/report



