

WHISTLEBLOWING POLICY

1. About this policy

- 1.1 EFT International is committed to conducting its activities with honesty and integrity and we expect all our team leaders and volunteers to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations from occurring and to address them when they do occur.
- 1.2 The purpose of this policy is:
- (a) To encourage staff within the organisation (which for the avoidance of doubt includes volunteers, consultants, trustees and officers) to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
 - (b) To provide staff with guidance as to how to raise those concerns.
 - (c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.
- 1.3 This policy covers all employees, officers, trustees, consultants, contractors, volunteers, casual workers and agency workers. It does not form part of any employee's contract of employment and we may amend it at any time.

2. What is whistleblowing?

- 2.1 **Whistleblowing** is the reporting of suspected wrongdoing or dangers in relation to our activities. Whistleblowing is a last resort not an initial action and relates solely to the running of the organisation and not personal treatment such as bullying which would come under the anti harassment. This may include:
- (a) criminal activity;
 - (b) failure to comply with any legal or professional obligation or regulatory requirements;
 - (c) miscarriages of justice;
 - (d) danger to health and safety;
 - (e) damage to the environment;
 - (f) bribery;
 - (g) facilitating tax evasion;
 - (h) financial fraud or mismanagement;

- (i) conduct likely to damage our reputation or financial wellbeing;
- (j) unauthorised disclosure of confidential information;
- (k) negligence;
- (l) the deliberate concealment of any of the above matters;
- (m) unprofessional conduct.

2.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

2.3 This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work.

2.4 If you are uncertain whether something is within the scope of this policy you should seek advice from the Volunteer Coordinator, whose contact details are at the end of this policy.

3. How to raise a concern

3.1 We hope that in many cases you will be able to raise any concerns with your team leader. You may tell them in person or put the matter in writing if you prefer. You may also choose to communicate your concerns to the Volunteer Director. They may be able to find a way of resolving your concern quickly and effectively. However, if you feel that your team leader or the Volunteer Director has not addressed your concern, you should contact the EFTi Board of Trustees. Contact details are at the end of this policy. You should expect to receive some status feedback on your concerns within a two week period.

3.2 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

4. Confidentiality

4.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

4.2 We do not encourage staff to make disclosures anonymously, although we will make every effort to investigate anonymous disclosures. You should be aware that proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Volunteer

Coordinator or one of the other contact points listed below and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt, you can seek advice from Protect, the independent whistleblowing charity, which offers a confidential helpline. Their contact details are at the end of this policy.

5. External disclosures

5.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

5.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Protect operates a confidential helpline. Their contact details are at the end of this policy.

6. Protection and support for whistleblowers

6.1 We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

6.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your team leader or the Volunteer Coordinator immediately.

6.3 You must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to appropriate action (including possible disciplinary action in respect of employees).

6.4 However, if we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to appropriate action (including possible disciplinary action in respect of employees).

6.5 Protect operates a confidential helpline. Their contact details are at the end of this policy.

7. Contacts

Your Team Leader: As a volunteer, you should have the contact information of your Committee Leader who can be also found at: <https://eftinternational.org/about-us/efti-leadership/> where it lists each Committee and the respective Committee Chairs and their email addresses.

The Volunteer Director currently is Donna Dennison and can be reached at donna@eftinternational.org

The EFTi Board of Trustees can be contacted at trustees@eftinternational.org

“Protect” (an independent whistleblowing charity) can be reached at <https://protect-advice.org.uk> and their helpline is 020 3117 2520 in the U.K.