



WHISTLEBLOWING POLICY

(Disclosing malpractice in the workplace)

Version 1.0 30/07/2019

Version 2.0 18/11/2019

Version 3.0 13/12/2019

Purpose

It is vital that everyone who works for MAMA 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, will have disciplinary action taken against them.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

This policy is publicly available on the MAMA website (www.mamazur.org).

Malpractice

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;
- Sexual misconduct, including sexual abuse, harassment or exploitation (see also MAMA's Safeguarding Policy);
- Abuse or exploitation of children, vulnerable adults or beneficiaries (see also MAMA's Safeguarding Policy as above);
- 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.

Whistleblowing is **not** raising a complaint about the behaviour of a manager or other work colleague towards you: this is covered by MAMA's Complaints policy.

How to raise a concern

Please note this procedure is not intended to replace MAMA's Complaints policy, which continues to be the appropriate way to raise personal issues relating to the specific job or employment.

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

1. Raise the matter with your line manager, who will consult with the appropriate contact point. If you feel that you are unable to raise the matter with your line manager, and you are able to, raise it with a more senior manager.

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 do you know about it?
- When were you first concerned about it?
- Have you told anybody about it?
- Was any action taken?

All managers should:

- Report incidents of theft, fraud, or corruption immediately to MAMA's Fraud and Corruption lead
 - Report Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any MAMA representative to MAMA's Named Safeguarding lead
 - Report any other incidents of malpractice in the workplace to your HR team, or to the Head of Human Resources
2. 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.
 3. When matters are reported pertaining to Fraud and Corruption, MAMA'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.



4. When matters are reported to the Named Safeguarding lead, MAMA's Safeguarding 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.

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

MAMA will take appropriate action, which may result in dismissal, in accordance with the relevant procedure against any employee, volunteer 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.

Whistleblowing Reporting Officers

Whistleblowing concerns can be reported to any of the MAMA Trustees, or via the MAMA website (<http://mamazur.org/>):

Rhiannon Grindle	Chairperson	rhi.grindle@btinternet.com
Sofia Giannopoulou	Treasurer	sofiagiannopou@yahoo.gr
Harriet Jacobs	Named Safeguarding Lead	hattyivey@hotmail.co.uk
Alexandra Kennedy	Secretary	alexandra.cairns@gmail.com

Training

All MAMA staff will be expected to read this policy in full. Volunteers will be given an executive summary, and will have access to the full policy for reference. All staff and volunteers will be provided with whistleblowing training at their induction, and evidence of this training will be kept in each volunteer and member of staff's file.

Frequently asked questions

What if the line manager is involved in the alleged malpractice in some way?

If the line manager is involved in the alleged malpractice in some way, the matter should be raised with the next senior manager in the management line. Concerns regarding financial wrongdoing may be raised directly with the Fraud and Corruption lead and concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any MAMA representative to the Safeguarding lead.



Can the disclosure be made 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.

Who will conduct the investigation?

Normally an independent person from within MAMA will be appointed. On rare occasions, or for complex cases such as safeguarding, external investigation support may be sought.

What if the matter involves a criminal offence?

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

What if the matter is a complaint about the performance or behaviour of a manager or colleague against me?

Such concerns should be raised in line with MAMA's Complaints Policy, unless the concerns relate to concerns of sexual misconduct or other forms of malpractice listed in this policy.

Related policies

Complaints policy

Safeguarding policy

Human resources manual

Code of conduct

Equality policy

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