



WHISTLEBLOWING POLICY

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 reportaconcern@integrityglobal.com

 www.integrityglobal.com

1. Introduction

Integrity upholds the highest ethical standards in our service delivery, our employment of staff and our interactions with people. We work hard, applying our core values to ensure not only that our clients receive the best possible service but that we benefit the communities amongst whom we work.

We also recognise that things do not always go according to plan and mistakes can be made. It is important that there are well understood and effective mechanisms for reporting issues and concerns.

Whistleblowing is the term used when an employee or other stakeholder passes on information concerning wrongdoing or suspected wrongdoing. It can be referred to as 'making a disclosure' or 'blowing the whistle.'

The purpose of this policy is to create a way for those working for Integrity, our partners and those we work amongst to report any actual or suspected wrongdoing in a safe way and with confidence that appropriate action will be taken. It takes into consideration the legal standards, context and potential complexities of the countries in which we work, which is particularly important in the creation of safe reporting mechanisms.

2. Applicability

The policy applies to any incident occurring on an Integrity site or during any activity conducted under Integrity. The mechanism should be used to report suspected wrongdoing or malpractice when it is believed it would not be safe or be effective to use normal reporting lines or when they have been reported through normal lines but are then not being addressed.

Example Issues:

- Safeguarding incidents
- Theft, fraud, bribery or corruption
- Legal breaches
- Discrimination, bullying or harassment
- Environmental or Health and Safety breaches
- Integrity policy breaches
- Code of Conduct or behaviour breaches

The whistleblowing mechanism should not be used:

- Where there is an immediate threat of harm to life or property –the relevant project emergency procedures should be used or the emergency services should be called as appropriate.
- To raise concerns about salaries, working hours or other management related concerns. These can be raised through the management chain or through HR.
- To settle personal disputes, disagreements, or grievances, these can be raised with HR.

3. Reporting

The Company encourages a free and open culture in its dealings between its employees and all people with whom it engages. In particular, the Company recognises that effective and honest communication is essential if mistakes are to be identified and addressed. It is important that communication around sensitive issues is conducted in a managed and professional manner.

Where possible concerns should be raised via management chains or direct to senior management. Concerns can also be reported via reportaconcern@integrityglobal.com **where they will be dealt with sensitively by a trained senior manager in the Operations Team.** We encourage concerns to be raised accountably wherever possible. This makes the subsequent investigation easier and allows updates on progress. If there are sensitivities, then knowledge of the report can be restricted to those “who need to know”. If it is only felt safe to report anonymously, then it is better to raise an issue anonymously than not at all.

When it is not perceived to be safe or effective to raise the issue internally, Integrity stakeholders also have the right to raise the issue with an appropriate external regulatory or independent body. Disclosures made to a legal adviser in the course of obtaining legal advice will be protected. The media is not a relevant external body. You should not contact the media with allegations about the Company.

4. Protection

The UK Public Interest Disclosure Act 1998 (PIDA) and US Whistleblower Protection Act 1989 provide whistleblowers legal protection from negative treatment or unfair dismissal and makes it unlawful to subject a worker to negative treatment or to dismiss them because they have raised a whistleblowing concern or made a ‘protected disclosure’.

This protection applies where a disclosure is made in good faith and where it is reasonably believed that the information disclosed and any allegation contained in it are substantially true and is in the public interest. If any disclosure is made falsely or in bad faith, for instance, in order to cause disruption within the Company, or if the disclosure is made for personal gain, then such a disclosure will constitute a disciplinary offence under the Company’s Disciplinary Procedure and may constitute gross misconduct for which summary dismissal is the likely sanction.

If you would like to seek independent confidential advice you can approach:

- [Whistleblower Protection | Office of Inspector General \(usaid.gov\)](https://www.usaid.gov/whistleblower-protection)
- [Whistleblowing for employees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/whistleblowing)
- [Citizens Advice](https://www.citizensadvice.org.uk/)

5. Response

All reports received will be investigated. Integrity commits to treat all disclosures consistently and fairly and to take all reasonable steps to maintain the confidentiality of the whistleblower where it is requested (unless required by law to break that confidentiality). Anonymous whistleblowers will not ordinarily be able to receive feedback and any action taken to investigate a disclosure could be limited by the need to maintain anonymity.

Steps may include:

- Contacting the person who made the report to gather further information.
- Conducting an initial internal investigation into the issues raised in the report to identify what further actions are required.
- Initiating a detailed internal investigation followed by internal action plan.
- Reporting to an external authority or establishing an independent review.

On conclusion of any investigation, the outcome and plan of action will be shared with the whistleblower. If no action is to be taken, the reason for this will be explained.



**LISTEN
COMPREHEND
RECOMMEND**