

## WHISTLEBLOWER POLICY

Policy number	IGOV-4	Version	002
Responsible person	Chris Armitage	Approved by Board on	6 January 2020
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### DEFINITIONS

**Whistleblowing** is defined as deliberate, voluntary disclosure of individual or organizational wrongdoing by a person who has access to data, events or information about an actual, suspected or anticipated wrongdoing within the organisation.

**Whistleblower** refers to any Representative(s) who attempts to make or wishes to make a report in connection with a wrongful act under this policy and who wishes to avail themselves of the protection offered by this policy.

A **wrongful act** includes, but is not limited to:

- breaches of legal obligations (including negligence, breach of contract, breach of administrative law);
- criminal offences;
- mismanagement of funds;
- actual or suspected fraud;
- abuse of authority;
- disclosures related to miscarriages of justice;
- health and safety risks, including risks to the public as well as other employees
- damage to the environment;
- the unauthorised use of organisational funds;
- possible fraud and corruption;
- sexual or physical abuse of clients;
- other unethical conduct; or
- the concealment of any of the above.

**Global Evergreening Alliance Representatives** – are all individuals and institutions who act on behalf of Global EverGreening Alliance regardless of whether or not there is a formal legal agreement between them and the Alliance. This includes, but is not limited to, all current and former members of the Board, employees, contractors, consultants, advisors, volunteers and implementing partners irrespective of which country their role is situated.

### SCOPE

This policy applies to all employees, volunteers and Board members of the Alliance. It will be extended to implementing partners through MOUs/Partnership Agreements.

## POLICY

The Global EverGreening Alliance (Alliance) seeks to conduct its activities professionally, honestly and with integrity at all times. However, all organisations face the risk of unprofessional conduct, criminal behaviour or mismanagement. The Alliance believes it is its responsibility to take appropriate measures to identify such situations and attempt to remedy them. The Alliance is committed to fostering a culture where its representatives are encouraged to raise concerns about unethical and unacceptable conduct and can do so in a safe environment.

The purpose of this policy is to strengthen the Alliance's core values by empowering all Representatives to report any wrongful acts in good faith. This Policy is intended to provide reporting mechanisms and the means through which all Global EverGreening Alliance Representatives (Alliance Representatives) regardless of their office location, are able to report alleged or suspected wrongful acts.

### Principles

- a) All Alliance Representatives have an obligation and are encouraged to report wrongful acts or suspected wrongful acts in accordance with this Policy;
- b) All Alliance Representatives also have the right to speak freely and honestly to report wrongful acts in a safe environment without fear of retaliation or reprisal;
- c) The Alliance will respond in a timely, respectful and confidential manner to all disclosures of wrongful acts; and
- d) The Alliance will take steps to protect its personnel from detrimental treatment or dismissal if they report actual or suspected wrongful acts in good faith.

### Reporting a Disclosure

- a) *Internal Whistleblowers (all current and former members of the Board, employees, contractors, consultants, advisors, and volunteers)*

Internal Whistleblowers are encouraged to report their concerns to their supervisor or their supervisors' manager to seek an immediate response. The manager must report the allegation to the Chief Executive Officer who is responsible for ensuring the matter is properly dealt with. This may include appointing an investigator independent of the area of operations to inquire into the allegations. Alternatively, it may be appropriate to continue to be dealt with by a line manager.

However, if the *Board members, employees, contractors, consultants, advisors, and volunteers* do not believe reporting to their supervisor or their supervisor's manager is appropriate given the circumstances of the wrongdoing, under this policy the report may be made directly to the designated internal whistle-blower protection officer:

Chief Executive Officer contact via [info@evergreening.org](mailto:info@evergreening.org)

- b) *External Whistleblowers (including other people with a relationship with the Alliance – e.g. donor, implementing partners)*

Where an external Whistleblower is reluctant to report it to line management for fear of retribution, they can report their concerns to a higher level of management than the person in the Alliance that they ordinarily deal with. This reporting avenue could be used where the staff member reasonably believes any of the avenues involving the Alliance management would not provide an independent assessment and/or investigation and that the allegation ought to be handled external to the Alliance management. This avenue is generally only appropriate in the instance of alleged or suspected wrongdoing involving senior Alliance management staff.

The external whistle-blower protection officer designated to receive reports of alleged or suspected wrongdoing is:

Board Chair – contact via [info@evergreening.org](mailto:info@evergreening.org).

### **Confidentiality**

If a wrongful act or a suspected wrongful act is reported under this policy, the Alliance will endeavor to protect the whistleblower's identity. In order not to jeopardise the investigation into the alleged wrongful act, the whistleblower is also expected to keep the fact they have raised a concern, the nature of the concern and the identity of those involved confidential. Generally, the Alliance will not disclose the whistleblower's identity unless:

- a) the whistleblower consents to the disclosure;
- b) the disclosure is required or authorised by law; and/or
- c) the disclosure is necessary to further the investigation.

The reports made under this policy will be treated confidentially to the extent possible. However, when a report is investigated it may be necessary to reveal its substance to people such as other Alliance Representatives, external persons involved in the investigation process and, in appropriate circumstances, law enforcement agencies. At some point it may also be necessary to disclose the fact and the substance of a report to the person who is the subject of the report. The Alliance will take reasonable precautions to store any records relating to an Incident Report of a wrongful act securely and to permit access by authorised personnel only. Unauthorised disclosure of information relating to a report, the identity of the whistleblower or information from which the identity of the whistleblower could be inferred will be regarded seriously and may result in disciplinary action, which may include dismissal.

### **Protection of whistleblowers**

No person who raises genuinely held concerns in good faith under this policy will be dismissed or subjected to any detriment as a result of such action, even if the concerns turn out to be unfounded. Detriment includes, but is not limited to, unwarranted disciplinary action and victimisation in any of the following forms:

- a) dismissal;
- b) demotion;
- c) any form of harassment;
- d) discrimination;
- e) current or future bias; or
- f) threats of any of the above.

Any such retaliatory action will be treated as serious misconduct and will result in disciplinary action which may include dismissal. If a whistleblower believes retaliatory action has occurred or has been threatened, the whistleblower has the right to make a submission to the Alliance Board. The Alliance Board is independent of management and will arbitrate the matter.

### **Whistleblowers implicated in a wrongful act**

Even though a whistleblower may be implicated in the wrongful act, they will not be subjected to any actual or threatened retaliatory action or victimisation in reprisal for making a report under this policy. However, making a report will not necessarily shield the whistleblower from the

consequences flowing from that person’s involvement in the wrongful act. In some circumstances an admission may be a mitigating factor when considering disciplinary or other action.

**False disclosures**

The Alliance will treat all disclosures of wrongful acts seriously and protect staff who raise concerns in good faith. However, while protection is provided to whistleblowers under this policy, deliberate false reports will not be tolerated and anyone found making a deliberate false claim or report will be subjected to disciplinary action, which could include dismissal.

**RELATED POLICIES AND PROCEDURES**

- Privacy Policy
- The Alliance Code of Conduct
- Complaint Handling Policy and Procedure

**REVISION HISTORY**

Revision Date	Revision no:	Summary description of revision(s) made	Section(s) changed:
18 December 2019	1	Definition of Scope Clarity on reporting channels	Principles Scope and Reporting a Disclosure

**AUTHORISATION**



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