



Whistleblowing Policy

1. Introduction

Three Wishes works towards a world wherein people are treated with dignity and respect and protected from harm. Our work is guided and supported by a contemporary safeguarding policy base that is consistent with professional best practice, which is compliant with the law and relevant regulations, and which reflects the nature of our work and that of our partners. Our intention is to promote the development of a safeguarding culture that prioritises the safety and well-being of our beneficiaries and provides contextualised working guidelines for our partner projects and for our staff and volunteers that ensure clear guidance to safeguard those who come into contact with us through our work.

Three Wishes' Whistleblowing Policy is one of three policies that contribute to its Safeguarding Standard, the others being its Code of Conduct and the Safeguarding policy itself. Three Wishes has four safeguarding standards, the others being People and Partnerships, Risk Management and Accountability. Three Wishes' policies are published on its website and may be seen here.

2. Policy position

Three Wishes is committed to conducting its operations with honesty, transparency, and integrity in an environment of openness. However, all organisations face the risk of things going wrong from time to time or of unknowingly harbouring illegal or unethical conduct. We encourage all employees, freelancers, interns and consultants, all volunteers within the UK and abroad, and trustees to report suspected wrongdoing as soon as possible and in accordance with this policy.

These concerns may be in relation to criminal activity, breach of a legal obligation (including negligence, breach of contract, breach of administrative law, safeguarding issue), miscarriage of justice, danger to health and safety or the environment, and the cover up of any of these in the workplace. It applies whether or not the information is confidential.

Any concerns of this nature will be taken seriously and investigated. Any individual who raises genuine concerns reasonably and responsibly will not be penalised in any way, even if they turn out to be mistaken.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

The intent of this policy is to provide a framework on whistleblowing concerns that relate to internal matters.

Including asylum seekers, displaced people, and refugees Three Wishes does not provide pathways to whistle blow on other organisations, including our implementing partners. However, for any concerns related to third parties we encourage you to report these internally first in the organisation concerned.

3. Purpose

The purpose of this policy is to:

- Provide an internal mechanism for reporting, investigating, and remedying any wrongdoing in the workplace, and, where necessary, to alert any external individual or organisation such as a regulatory body; and
- Reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

4. Scope

This policy applies to all individuals working at all levels of the organisation, including all employees, freelancers and consultants, interns, all volunteers, and officers within the UK and abroad.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. We refer you to Three Wishes' Grievance Policy and Grievance Procedures in the staff handbook.

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

5. What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- A criminal offence.
- The breach of legal obligation.
- A miscarriage of justice.
- A danger to the health and safety of an individual.
- Damage to the environment.
- Failure to comply with any legal obligation or regulatory requirements.
- Financial fraud or mismanagement.
- Conduct likely to damage our reputation.
- Unauthorised disclosure of confidential information.
- Deliberate attempt to conceal any of the above.

A 'whistle-blower' is a person who raises a genuine concern relating to any of the above. If an individual has genuine concerns related to suspected wrongdoing or danger affecting any of the organisation's activities, they should report it under this policy. The individual has no responsibility for investigating the matter; it is the organisation's responsibility to ensure that an investigation takes place.

It is understandable that whistle-blowers are sometimes worried about possible repercussions. Three Wishes will not allow the person raising the concern to suffer any detrimental treatment for doing so. This includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If an employee believes they have suffered any such treatment they should inform the Whistleblowing Officer right away. If the matter is not remedied, they should raise it formally through the organisation's grievance procedure.

6. Guiding Principles

When resolving concerns raised by whistle-blowers Three Wishes will:

- Treat any retaliation against or threats to whistle-blowers as a serious matter that may lead to disciplinary action that may include dismissal.
- Not attempt to conceal evidence of poor or unacceptable practice.
- Take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct.

- Ensure confidentiality clauses in employment contracts do not restrict, forbid, or penalise whistleblowing.
- Ensure any matter raised under this procedure is thoroughly and promptly investigated, and the outcome of the investigation reported back to the person who raised the issue.

7. Confidentiality

We hope that staff will feel able to voice concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. This is because proper investigation may be more difficult or impossible if we cannot obtain further information from you and it is also more difficult to establish whether any allegations are credible. Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can be taken to preserve confidentiality.

8. Procedure

Three Wishes encourages staff to voice whistleblowing concerns openly with a member of the senior management team or your line manager in the first instance. You may tell them in person or put the matter in writing if you prefer. They may be able to agree on a way to resolve your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officer.

However, where the matter is more serious, or you feel that your line manager or the member of the senior management team has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact the Whistleblowing Officer.

Upon receipt of your concern an investigation will be opened, and a meeting will be arranged as soon as possible. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. You may be required to attend additional meetings in order to provide more information.

If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more within our safeguarding, grievance resolution or other relevant procedure, we will let you know.

A written statement of your concern will be taken and a copy of this will be provided to you. We will also aim to give you an indication of how we propose to deal with the matter.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation confidential.

If we conclude that a whistle-blower has made false allegations maliciously, the whistle-blower will be subject to disciplinary action.

9. If you are not satisfied

While we cannot always guarantee the outcome you are seeking, we will try to deal with any concern fairly and appropriately.

9.1 Escalation Procedure

If you are not happy with the way in which your concern has been handled, you may contact the Head of Compliance and Operations at the contact details below.

9.2 External reporting

Three Wishes will make every effort to resolve your complaint internally and in most cases, you should not find it necessary to report to anyone externally.

However, 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. This could include:

- HM Revenue and Customs.
- Health and Safety Executive.
- Serious Fraud Office.
- Charity Commission.
- Pensions Regulator.
- Information Commissioner.
- Financial Conduct Authority.

It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

More information on the above-mentioned bodies can be found here: Whistleblowing: list of prescribed people and bodies - GOV.UK (www.gov.uk)

10. Contact details

10.1 Three Wishes

The Whistleblowing Officer has day-to-day operational responsibility for this policy. The Whistleblowing Officer can be contacted at people@3wishes.org.

You can contact the Head of Compliance and Operations at compliance@3wishes.org if you are unhappy with the way your report was managed by Three Wishes at the first instance.

10.2 Other bodies

If an individual is unsure about whether or how to raise a concern or wants confidential advice, they can contact the independent charity, Protect Speak Up, Stop Harm (<https://protect-advice.org.uk/>). Telephone: 020 3117 2520.

Free information and advice can also be obtained from the Advice, Conciliation and Arbitration Service (ACAS). Telephone: 08457 47 47 47.

If an individual feels it is more appropriate to report a matter to another organisation, the following list provides organisations concerned with standards in the voluntary sector:

The Charity Commission telephone: 0845 300 0218

Audit Commission for local authorities and the National Health Service in England and Wales telephone: 0844 798 3131

Health and Safety Executive: contact on-line; <https://www.hse.gov.uk/contact/index.htm> or in and emergency telephone 0845 300 9923.

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