



Whistleblowing process

1. Introduction

VSO aims to maintain the highest standards of openness, decency, integrity and accountability in its work. Everyone who works with or for VSO must be vigilant for signs of wrongdoing or criminal activity by individuals or organisations working with or for VSO and are encouraged to report such behaviour using this policy.

This is a global procedure and applies to employees, workers, agency workers, volunteers, partner organisations, donors, suppliers, agents, contractors or sub-contractors of VSO or any person associated with VSO wherever located.

This process is separate from and in addition to VSO's grievance processes for employees or complaints process for volunteers. If an individual is uncertain as to whether or not something is within the scope of this process, they should seek advice from their line manager or People Group representative.

VSO will not tolerate the intimidation or victimisation of anyone raising a genuine concern under this policy. Anyone who tries to deter, intimidate or victimise an individual in a bid to prevent them from reporting a suspicion, will be subject to appropriate formal action and, if appropriate, may be reported to the relevant authorities.

2. Equal opportunities

VSO aims to treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity.

3. What should be reported

A reportable act is one made in the public interest by an individual who has a reasonable belief that one of the following is being, has been, or is likely to be, committed:

- Criminal offences (eg fraud, bribery, corruption, money laundering, modern day slavery, supporting or involvement in terrorism).
- Failure to comply with legal obligations or regulatory requirements;
- A miscarriage of justice.
- Endangering someone's health and safety.
- Damage to the environment.
- Covering up wrongdoing.
- Unethical conduct.

Individual issues (eg bullying, harassment, discrimination) should be reported under VSO's grievance policy (employees) or complaints procedure (volunteers, third parties etc).

Not reporting a suspicion when there are clear grounds for doing so could result in disciplinary action or other sanctions.

4. Procedure

4.1 Concerns should be raised as early as possible. Concerns may be raised verbally but preferably in writing or by email, giving any background and history, including relevant dates and any witnesses.

In the first instance, concerns should be raised with your immediate line manager. However, if your

line manager is involved in the wrongdoing or you feel unable to raise the matter with your line manager, you should report your concerns to one of the following:

- A more senior manager.
- A People Group representative.
- VSO's dedicated whistleblowing email address whistleblowing@vsoint.org.

4.2 An investigation will then be carried out. You must not investigate yourself, this could result in either the destruction or contamination of evidence or put your own safety at risk.

4.3 Following the investigation, the whistleblower will be informed of the outcome and what action will be taken, which may be to do nothing or to follow the full disciplinary procedure. However, the need for confidentiality may mean that you cannot be given much detail.

You should treat any information you are given regarding the investigation as confidential.

4.4 If you believe that your concern has not been dealt with properly or the wrongdoing is still going on, you should raise your concerns with an Executive Director, the Head of Internal Audit or the Chair of the Audit Committee.

5. Anonymity

Individuals are encouraged to put their name to any whistleblowing disclosures they make. Concerns expressed anonymously will be considered at the discretion of VSO, taking into account:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

6. Confidentiality

VSO will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

7. Reporting externally

If, on conclusion of the procedure in section 4, the whistleblower reasonably believes that the appropriate action has not been taken, he/she should report the matter to one of the following UK bodies:

- HM Revenue & Customs;
- the Financial Conduct Authority (formerly the Financial Services Authority);
- the Competition and Markets Authority;
- the Health and Safety Executive;
- the Environment Agency;
- the Independent Office for Police Conduct; and
- the Serious Fraud Office.

8. Malicious reports

Individuals who make malicious accusations under this policy ie those which are not true, may be subject to formal action (such as disciplinary action for employees or volunteer status review process for volunteers).

9. Useful contacts

If you require further advice, you can speak to your People Group representative or contact the confidential VSO whistleblowing email address whistleblowing@vsoint.org.

Advice can also be obtained from outside VSO through the whistleblowing organisation, Protect. This organisation is UK based, but can provide advice on whistle-blowing from other countries:

Telephone +44 (0)20 3117 2520
Email whistle@protect-advice.org.uk
Website www.pcaw.co.uk

Chair of the Audit Committee: Chris Merry (chris.merry@vsoint.org)

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