

# WHISTLEBLOWING POLICY

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## 1. Introduction

AmplifyChange's vision is the full attainment of Sexual and Reproductive Health and Rights (SRHR) for all, including women and girls, young people, and the vulnerable and marginalised. Our mission is to be the global leader in supporting grassroots organisations and building stronger, more inclusive movements for SRHR, especially in challenging contexts.

AmplifyChange has a zero-tolerance approach to fraud, corruption, bribery, terrorism funding, child or adult harm, abuse, sexual harassment, exploitation, bullying, modern slavery and human rights violations. We are committed to creating an environment in which you feel able to report violations. We are committed to conducting our operations with honesty and integrity and expect all our staff to maintain high standards in accordance with our policies and procedures.

This Whistleblowing Policy is designed to support our commitment to upholding ethical values and practices and to ensure that employees, grantees, consultants, and stakeholders can feel comfortable raising concerns without fear of retribution. Besides, this policy provides a transparent and confidential process for dealing with concerns including, but not limited to: corruption, fraud, human trafficking, slavery, health and safety, harm, abuse and exploitation of children and at-risk adults, including harassment, bullying, and terrorism funding.

## 2. Scope of Policy

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers for publicly disclosing certain serious concerns. AmplifyChange has endorsed the

provisions to ensure there is no feeling of being at a disadvantage when raising legitimate concerns.

This policy applies to all employees of AmplifyChange wishing to raise a concern regarding malpractice or wrongdoing within the organisation. It also includes those on secondment, external consultants, contractors, suppliers and any individual or contractor working with AmplifyChange.

It is also for individuals from AmplifyChange grantee organisations or any third party who wishes to raise a concern about AmplifyChange, its staff, consultants, representatives, partners or the organisations it supports.

It is intended to assist individuals who believe they have discovered malpractice or wrongdoing. It is not designed to question financial or operational decisions nor should it be used to reconsider any matters, which have already been addressed under harassment, complaint, disciplinary or other procedures.

This policy is intended to cover concerns, which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary.

## 3. Definition

Whistleblowing is the disclosure of information which relates to suspected wrongdoings, which may include (but is not limited to):

- Criminal activity,
- Failure to comply with any legal or professional obligation or regulatory requirements,
- Miscarriages of justice,



- Danger to health and safety,
- Danger to the environment,
- Bribery,
- Financial fraud or mismanagement,
- Misuse of funds,
- Corruption,
- Breach of internal policies and procedures,
- Breach of the Code of Ethics
- Unauthorised disclosure of confidential information,
- Negligence,
- Safeguarding incidents (see safeguarding policy),
- Sexual misconduct, including sexual abuse, harassment or exploitation (see Safeguarding Policy)
- Exploitation such as Human Trafficking or slavery
- The deliberate concealment of any of the above

Any individuals who become aware of wrongdoing by an AmplifyChange employee, representative, partner, consultant or grant holder can be fearful of raising concerns but there is legislation in place to protect employees including the Public Interest Disclosure Act 1998 (PIDA) and the Enterprise and Regulatory Reform Act 2013 (ERRA), whereby employers can be held liable for the harassment or victimisation of employee whistle-blowers by their colleagues. Co-workers who victimise whistle-blowers will also be personally liable and may become parties to a claim along with the employer.

For whistle-blowers who are not employed by AmplifyChange, this policy offers protection from reprisals by AmplifyChange towards third party individuals who disclose concerns in good faith.

#### **4. Policy Statement**

Every employee, consultant, representative, partner or grantee has a duty to speak up about genuine concerns in relation to wrongdoings. Any third party also has the right to whistle-blow about an AmplifyChange employee, representative, partner, consultant or grant holder.

An employee making the disclosure will be protected under PIDA if they have an honest and reasonable suspicion that the malpractice has occurred, is occurring or is likely to occur. Concerns raised will be treated seriously and those raising them will be treated fairly and justly. However, where a false and malicious allegation is raised by an employee, disciplinary proceedings may be instigated.

#### **5. Safeguards**

It is recognised that raising a concern may be a daunting and difficult experience. This policy is designed to ensure protection from victimisation and AmplifyChange will ensure concerns are taken seriously, will never attempt to conceal evidence of poor or unacceptable behaviour or practice, take disciplinary action where an employee destroys or conceals evidence of unacceptable practice or misconduct, and ensure confidentiality clauses in employment contracts do not restrict, forbid or penalise whistleblowing.

AmplifyChange is committed to investigating all incidents that are reported. The investigating officer will be the CEO supported by the Fiduciary Risk Manager and Head of Operations. All reports will be dealt with in confidence and only those who need to know will be informed.

## **6. Protection**

This policy is designed to offer protection to those employees who disclose such concerns provided the disclosure is made in good faith in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

## **7. Confidentiality**

AmplifyChange 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.

## **8. Anonymous Allegations**

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of AmplifyChange. In exercising this discretion, the factors considered will include:

The seriousness of the issues raised,

The credibility of the concern, and

The likelihood of confirming the allegation from attributable sources.

All efforts will be made to ensure that only those investigating the concern know the identity of the whistle-blower. There may however be instances when it will become necessary to reveal the identity of the person raising the concern. The investigating staff will discuss this with the individual concerned before doing so and will take all reasonable steps to ensure that they suffer no detriment.

## **9. Untrue Allegations**

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure, the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

## **10. How to raise a concern/Whistleblowing**

AmplifyChange encourages all staff and consultants with a concern to raise this internally in the first instance. However, anyone in doubt can seek free, confidential whistleblowing advice from Protect on 020 3117 2520 or by [email](#).

All employees, consultants, contractors, suppliers, grantees and associated person(s) anywhere in the world, are expected to report any suspected malpractice or wrongdoing and to cooperate with any investigation of such concerns. Concerns can be raised by contacting the CEO or Head of Operations. Timely notification permits AmplifyChange to resolve issues expeditiously. Timeliness also permits AmplifyChange to inform donors, clients or grantees of possible wrongdoing that may require their involvement.

AmplifyChange has also engaged EthicsPoint a leading whistleblowing service provider to enable staff, consultants, grantees and any external parties to whistle-blow. This is anonymous, free-to-call and confidential hotline report a serious incident concerning a potential breach of company policy, safeguarding, bribery, conflict of interest, corruption, fraud, money laundering, terrorism finance, misuse of funds, a security issue or malpractice, please click on this link:

<https://amplifychange.org/contact/whistleblowing/>

## **11. The investigative process**

The CEO appoints an investigating officer for each report in due recognition of content of the case and to ensure that no conflicts of interest prevail. Where the complaint is against a senior manager or the CEO, a suitable Board of Director or senior manager will be appointed to investigate to ensure impartiality and free from conflict of interest.

If a concern is raised orally, the appropriate line manager will take detailed notes and pass this information to the investigating officer. Where there are occasions involving an

anonymous disclosure, the information should be passed to the investigating officer.

The investigating officer will establish and record the basis of the concerns that have been raised. The person raising the concern may be accompanied at any fact-finding meeting(s) by a fellow employee. The fellow employee attending any such meetings will be bound by confidentiality and may confer with the person making the claim but may not answer questions on their behalf.

The investigating officer will establish any further actions that should be taken to ensure a thorough investigation; the main objective will be to ascertain whether a malpractice has occurred and whether the matter should be dealt with by the policy or internally. Where it is clear the police should be involved the investigating officer should notify them at the earliest opportunity. Caution must be exercised to ensure internal investigations do not compromise an investigation by the police.

The investigating officer will take a written report containing the findings of the investigations and reasons for any judgement. The report will be passed to Chair of the Board who will decide what action should be taken.

AmplifyChange will aim to keep the complainant informed of progress and the outcome of the investigation where appropriate. However, sometimes the need for confidentiality may prevent specific details being given. Any information given to the complainant should be treated as confidential.

Where the complaint is shown to be justified, disciplinary proceedings may be invoked against the subject of the complaint. It is important to remember the boundaries of confidentiality when pursuing disciplinary action with an

individual and it will be inappropriate to disclose full details of any action taken against the subject of a complaint or concern.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chair of the Board.

If there is evidence of criminal activity, then the investigating officer may inform the police. AmplifyChange will ensure that any internal investigation does not hinder a formal police investigation.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, AmplifyChange recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

## **12. Responsibilities**

AmplifyChange Directors, senior managers, and line managers will take appropriate action to ensure compliance with this

policy. The CEO, Fiduciary Risk Manager and Head of Operations will promote and monitor compliance and determine when actions have occurred that are in violation of this policy. All other AmplifyChange employees, consultants, contractors, grantees, and associated persons will ensure their individual compliance with this policy.

## **13. Communication and Training**

AmplifyChange ensures that its whistleblowing and associated policies and procedures are embedded and understood through internal and external communication, including training that is proportionate to the risk it faces. The Head of Operations with support of the Fiduciary Risk Manager will be responsible for ensuring employees receive appropriate training and for the communication of the Whistleblowing Policy and other relevant policies to associated persons such as contractors and suppliers.

## **14. Review of Policy**

The Whistleblowing Policy will be reviewed on a 2-yearly cycle, or more frequently if changes to the legal or operating environment justify a review.

**Annex 1 Schedule of revisions**

<b>Version</b>	<b>Date</b>	<b>Revisions</b>
V1	June 2021 (created)	
V2	November 2022	No fundamental changes
V3	April 2024	Minor editorial revisions including job titles, weblinks. Update of name and contact details of confidential, advice line. Addition of schedule of revisions. Amended to 2-year review cycle.