

## **Pratham UK**

# **Confidential Reporting (Whistleblowing) – Policy and Guidance**

**May 2020**

## **1. Introduction**

- 1.1** This policy applies to the entire Pratham UK workforce whether full-time or part-time, employed through an agency, and volunteers and consultants.
- 1.2** This policy is primarily for concerns or disclosures where the interest of others or of Pratham UK is at risk. Such concerns or disclosures are ones that the individual(s) raising the concern reasonably believes tend to show that one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:
- Any action that endangers the safety or wellbeing of a child
  - a criminal offence
  - the breach of a legal obligation
  - a miscarriage of justice
  - a danger to the health and safety or dignity of any individual
  - a material breach of the Code of Conduct
  - damage to the environment
  - deliberate concealment of information tending to show any of the above matters
- 1.3** When a concern feels serious because it is about a possible fraud, danger or malpractice that might affect beneficiaries, colleagues or Pratham UK, it can be difficult to know what to do. Staff or volunteers may individually or collectively be worried about raising such a concern or may decide to say something but find that they have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.
- 1.4** The policy provides an alternative route for raising concerns if they do not feel able to raise it through normal management channels or the person raising the issue feels that it is sufficiently serious to escalate because there has been no progress in addressing the issue through management.

## **2. Pratham UK's Assurances**

- 2.1** The Board and Directors are committed to this policy. If Pratham UK employees or volunteers raise a genuine concern under this policy, they will not be at risk of losing their jobs or suffering any form of retribution as a result. Pratham UK will not tolerate the harassment or victimisation of anyone raising a genuine concern. Rather than wait for proof, Pratham UK prefers that you raise the matter of

concern. Provided you are acting in good faith, it does not matter if you are mistaken.

- 2.2** Pratham UK actively promotes accountability and good practice in the workplace and wishes to ensure that concerns about suspected serious malpractice, illegal or dangerous practices can be properly raised by workers and addressed before the public interest is affected. Pratham UK will make every effort to thoroughly investigate and deal seriously with such concerns, raised in good faith and through the following procedure, in a fair, objective and discreet manner.
- 2.3** With these assurances, we hope you will raise your concern openly. However, we recognise that there may be circumstances when you would prefer to speak to someone in confidence first. If this is the case, please say so at the outset. If you ask us not to disclose your identity, we will not do so without your consent unless required by law.
- 2.4** Individuals raising a concern should understand that there may be times when Pratham UK is unable to resolve a concern without revealing their identity, for example where personal evidence is essential. In such cases, we will discuss whether and how the matter can best proceed with the individual raising the concern.
- 2.5** If you are unsure about raising a concern you can get independent advice from Public Concern at Work (see contact details under Independent Advice).

### **3. How to Raise Concerns Internally**

- 3.1** The individual raising the concern does not need to have firm evidence of malpractice before raising a concern. However, we ask that the individual explains as fully as they can the information or circumstances that gave rise to their concern. The method of disclosure could be verbal, but ideally it should be in writing (a letter/email) sent to one of the named persons.

#### **3.2 Step One**

Pratham UK workers or volunteers who become aware of any criminal wrongdoing on the part of colleagues, senior officers or others, or who have serious concerns about malpractice, theft or fraud which might adversely affect Pratham UK business or reputation, or might otherwise put at risk the health or safety of anyone, should first raise it in confidence with their line manager. This may be done verbally or in writing.

#### **3.3 Step Two**

If the individual raising the concern believes that it is not appropriate to report to a staff member or the matter has not been satisfactorily dealt with then they can use the Whistleblower Hotline direct to a Trustee (the Chair of the Governance and HR Committee) on the email below: Email: **TBC**

Following this, if you remain dissatisfied and your complaint refers to Pratham UK UK, you can get in touch with either the UK Fundraising Regulator, if your complaint is about fundraising, or the UK Charity Commission, for other areas of our work.

Their contact details are below:

Fundraising Regulator  
2nd Floor CAN Mezzanine Building  
49-51 East Road London N1 6AH  
[www.fundraisingregulator.org.uk](http://www.fundraisingregulator.org.uk)  
Tel: 0300 999 3407  
Email: [enquiries@fundraisingregulator.org.uk](mailto:enquiries@fundraisingregulator.org.uk)

The Charity Commission  
P O Box 1227  
Liverpool L69 3UG  
Tel: 0845 3000 218  
[www.charity-commission.gov.uk](http://www.charity-commission.gov.uk)

If your complaint relates to financial fraud on a DFID funded project then you can also contact:

Counter Fraud Section, Head of Internal Audit Abercrombie House, Eaglesham Road, East Kilbride G75 8EA  
Email: [fraud@dfid.gov.uk](mailto:fraud@dfid.gov.uk) Confidential hotline +44 (0)1355 843747

## 4. How Pratham UK will handle concerns raised

- 4.1 Issues of concerns & disclosure will wherever possible be acknowledged within 5 working days.
- 4.2 Once a concern has been received it will be assessed and considered with regards to appropriate action to be taken. The named person who has been contacted will make every effort to deal with such disclosure in a fair & objective manner by investigating the matter as quickly as possible or nominating an appropriate person to do so.
- 4.3 The investigating manager will discuss with the Chair whether the allegation represents a “serious incident” and needs to be reported to the Charity Commission.
- 4.4 This may involve an internal investigation under the Disciplinary Procedure or if appropriate, an external investigation. Pratham UK will tell the individual who had raised the concern who will be handling the matter, how they can be contacted and what further assistance (if any) is required of the individual raising the concern.
- 4.5 When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset.
- 4.5 Whenever possible, you will be given feedback on the outcome of any investigation. However, we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

- 4.6 On completion of the investigation the named person will make a recommendation on the appropriate course of action to the Chair/Board who will make the final decision.
- 4.7 All whistleblowing Complaints will be reported to the Board.

## 5. Independent Advice

- 5.1 If you are unsure whether to use this policy or you want confidential advice at any stage, you may contact the independent UK charity Public Concern at Work on 020 7404 6609 or by email at [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk). Their lawyers can talk you through your options and help you raise a concern about malpractice at work.