

HAY2TIMBUKTU

Whistleblowing Policy

Approved by the Trustees on 23 August 2021

Whistleblowing Policy

1. Purpose

This policy aims to help the trustees and anybody associated with Hay2Timbuktu's activities to raise any concerns they may have about breaches of Hay2Timbuktu's policies without having to worry about being victimised, discriminated against or disadvantaged in any way as a result.

2. Values

Hay2Timbuktu:

- is committed to being open, honest and accountable, encouraging a free and open culture in its dealings between the Trustees and those working in partner organisations.
- will support anyone who raises concerns in good faith under this policy, even if a subsequent investigation finds that they were mistaken. No one will suffer any detrimental treatment as a result of reporting a concern under this policy.
- maintain the confidentiality of those who raise concerns. The trustee designated to oversee compliance with this policy will only notify the other trustees where required.

3. Procedures

Hay2Timbuktu will:

- apply these whistleblowing procedures to all of Hay2 Timbuktu's activities and policies, including but not limited to safeguarding, anti-bribery, anti-corruption and fraud.
- appoint a Compliance Trustee to oversee the operation of this policy and to act as a first contact point for any reports of suspected breaches of policy.
- familiarise all persons and organisations with whom it is associated with these whistleblowing procedures so they can express their concerns swiftly and confidentially.
- ensure that the principles and practices of this policy are reflected in all agreements between Hay2Timbuktu and grant partners.
- review reports from the designated trustee at Trustee meetings, which shall have regard to the need to maintain confidentiality.
- review the operation of the policy annually at Trustee meetings.

4. What types of concerns?

The policy is to deal with serious or sensitive concerns about wrongdoings such as the following:

- a criminal offence.
- a failure to comply with any legal obligation.
- a failure to comply with Hay2Timbuktu's policies.

- a failure in the protection of children or vulnerable adults or any other safeguarding issue.
- instances of actual or suspected bribery, corruption or fraud.
- a health and safety risk to an individual
- concealment of the above.

It is not necessary for individuals who raise the concern to prove the wrongdoing that is alleged to have occurred or is likely to occur. However, if an individual knowingly or maliciously makes an untrue allegation, Hay2Timbuktu may take appropriate disciplinary action against them.

5. How to raise a concern

Individuals are encouraged first to discuss any concerns with the trustee responsible for the policy that covers the area of concern, if any. If that is not considered appropriate, or if it is not clear which trustee should be approached, any suspected concerns should be discussed with the Compliance Trustee, who is designated to oversee compliance with this Whistleblowing Policy.

Individuals are encouraged to raise their concerns in writing where possible, setting out the background and history of their concerns (giving names, dates and places where possible) and indicating the reasons for their concerns.

6. Protecting the individual raising the concern

If an individual raises a concern which they believe to be true, Hay2Timbuktu will take appropriate action to protect the individual from any harassment, victimisation or bullying.

The matter will be treated confidentially if the individual requests it and their name or position will not be revealed without their permission unless Hay2Timbuktu must do so by law. If the concern cannot be resolved without revealing the individual's identity, the trustee designated to oversee compliance with this policy will discuss with the individual whether and how to proceed.

7. How Hay2Timbuktu will deal with the concern

Hay2Timbuktu will give the individual feedback on the progress and outcome of any investigation wherever possible.

If the suspicions are not confirmed by an investigation, the matter will be closed. Any person making an allegation will not be treated or regarded any differently for raising the concern and their confidentiality will continue to be protected.