Whistleblowing policy

Title:	Whistleblowing policy
Policy statement:	Tearfund is committed to maintaining the highest standards of openness, probity and accountability in keeping with our values of being Christ-centred, truthful, courageous, compassionate and servant-hearted. An important aspect of accountability and transparency is a mechanism to enable staff and other people associated with Tearfund to voice concerns in a responsible and effective manner. When someone discovers information which they believe represents serious malpractice or wrongdoing within Tearfund which is in the public interest, this information should be disclosed without fear of reprisal. There should be arrangements to enable this reporting to be done independently of line management. **Whistleblowing Complaints that are protected by law are as follows:** ● criminal offence e.g. fraud, theft, bribery; ● the breach of a legal obligation e.g. failure to have the right insurance; ● a miscarriage of justice; ● a danger to the health and safety of any individual; ● risk or actual damage to the environment; ● sexual harassment or non-financial misconduct; or ● the deliberate concealment of information tending to show any of the above. The process for reporting is outlined in this whistleblowing procedure. If your concern does not relate to the list, please see the guidance in the procedure below for **'Other complaints and grievances**' and 'Safeguarding concerns'.
Procedures and other policies which relate to this policy:	● Complaints & Concerns Policy ● Personal Conduct Policy ● Supporter Charter ● Grievance Procedure ● Misconduct Procedure ● Conflict of Interest Policy ● Safeguarding & PSEAH policy (including anti-harassment) ● Fraud, Loss and Bribery Policy and Procedures ● Partner complaints process (as set out in the Partnership Agreement)

Why the policy is needed:	The Employment Rights Act 1996 (as modified by UK Public Interest Disclosure Act, which came into effect in 1999, reviewed in line with the Enterprise and Regulatory Reform Act - 2013 and as amended by section 23 of the Employment Rights Act 2025), gives legal protection to employees and other workers against being dismissed or penalised by their employers as a result of publicly disclosing certain serious legitimate concerns that are in the public interest. Tearfund has developed this policy and the associated procedure to ensure that no members of staff or representative who make a protected disclosure will be subject to any disadvantage, retaliatory action or adverse

	treatment in raising legitimate concerns. Tearfund also recognises that there may be occasions where external stakeholders wish to anonymously report serious legitimate concerns of a whistleblowing nature, which relate to serious malpractice or wrongdoing within Tearfund which are in the public interest, rather than through the normal reporting channels and this policy also provides for this.

Who must follow this policy:	Tearfund staff, consultants, contractors and volunteers must follow this policy. For external stakeholders such as members of the communities we serve, supporters, donors, members of the public and those who have a connection with Tearfund, concerns of a whistleblowing nature can be raised anonymously via the whistleblowing email directly (whistleblowing@tearfund.org), or through Safecall - an independent service - details are found in Section 5 of the procedure. Further details are set out in the **Safeguarding, Whistleblowing and Other Concerns** page on Tearfund's website. Partners: the procedure for partner feedback, disagreements and complaints is contained in the Partner Agreement. Partner complaints are covered under section 8, while general feedback and disagreements are addressed in Appendix 1, and procedures for community feedback are detailed in clause 5.3. Partners may also contact us directly through the whistleblowing email or using Safecall if they are concerned about serious malpractice, unacceptable practice or wrongdoing and wish to raise this concern anonymously. The Whistleblowing Team will determine the correct process to address the concern. All staff are required to complete Tearfund's mandatory e-Learning course on Whistleblowing upon joining, and then every 12 months. Tearfund's Misconduct Policy and Procedure will be applied if staff do not complete the training as required, unless there are exceptional extenuating circumstances.
Keywords:	whistleblowing, complaint, concern, malpractice, unacceptable fundraising practices, criminal, illegal, abuse, exploit, theft, fraud, bribery, corrupt, crime, human trafficking, wrongdoing, personal conduct, ombudsperson
Person responsible:	Director of People and Culture
Approved by:	Board
Approval date:	September 2026
Next formal review:	The next review and approval date is September 2029 (or sooner if legislation, best practice or other circumstances indicate this is necessary).

Whistleblowing procedure

1. What is Whistleblowing?

Whistleblowing is the disclosure of a concern that is in the public interest, relating to specific malpractice or wrongdoing.

Under the UK Public Interest Disclosure Act, "blowing the whistle" has a particular legal meaning.

The UK Government's guidance is that, "You're a whistleblower if you're a worker and you report certain types of wrongdoing. The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public." To satisfy this definition you must believe that:

(a) there has been wrongdoing, and

(b) your disclosure is in the public interest.

Whistleblowing Complaints that are protected by law are as follows:

- criminal offence e.g. fraud, theft, bribery;
- the breach of a legal obligation e.g. failure to have the right insurance;
- a miscarriage of justice;
- a danger to the health and safety of any individual;
- risk or actual damage to the environment;
- sexual harassment or non-financial misconduct; or
- the deliberate concealment of information tending to show any of the above.

Safeguarding Concerns:
Please note that if your concern relates to the abuse or exploitation of a child or adult e.g. sexual or physical abuse, and you are a member of Tearfund Staff, you should report it via TIMS (Tearfund's Incident Management System). If you are not a member of Tearfund staff or do not have access to a TIMS account, you should report any safeguarding & PSEAH concern to safeguarding@tearfund.org. Tearfund's Safeguarding & PSEAH Policy is available to give further guidance where required.

Other Complaints and Grievances:
If your complaint relates to your own personal circumstances, such as the way you have been treated at work, you should discuss your options with your HR Business Partner. It may be possible to resolve the complaint informally and, if not, a formal complaint can be raised using the Grievance Procedure.

Reports concerning sexual harassment or personal misconduct can be raised under this policy where the disclosure meets the public interest threshold or concerns wider organisational governance.

Staff who wish to raise a concern or complaint about wrongdoing which is not covered under the Whistleblowing Policy, and does not affect them personally, can do so by emailing complaints@tearfund.org. Please see Tearfund's Complaints & Concerns Policy for more information.

If you are uncertain whether something is within the scope of this policy, please contact the Whistleblowing Team for advice by sending an email to whistleblowing@tearfund.org.

2. Confidentiality of the whistleblower

All concerns will be managed confidentially as far as possible. That means all information on the matter, including the identity of individuals concerned, will only be shared where necessary with the relevant whistleblowing investigation team.

We aim to create a culture that enables individuals to speak up about issues that concern them before they escalate, and to do so with the comfort of knowing they will be listened to and not punished. We hope therefore that individuals will feel able to voice any whistleblowing concerns openly under this policy. Anonymous reports can make an investigation more difficult or impossible because it is not possible or more difficult to establish whether the allegations are credible. Therefore Tearfund encourages whoever is raising a concern to provide a contact name and telephone number/email address. If it is necessary for those investigating your concern or others (such as the Police) to know your identity, we will discuss this with you.

We expect individuals to respect the internal investigation process and keep all information about their concerns confidential. If an individual has a concern about how the concern is being dealt with, they should contact the Director of People and Culture directly, or contact the Tearfund ombudsperson at ombudsperson@tearfund.org.

3. Protection for the person/s 'blowing the Whistle'

The Public Interest Disclosure Act (1999) protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing.

There must be no fear of punishment or unfair treatment (e.g. dismissal, victimisation or any other detrimental treatment as a result of whistleblowing) from anyone at Tearfund. Tearfund will take disciplinary action against any staff member found to be in breach of this policy. However, individuals who 'blow the whistle' should make sure that the information provided is substantially true and is an honest explanation of the concern.

If an individual makes an allegation that they reasonably believe to be true, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure an individual should be careful to ensure the accuracy of the information.

If, however, it is found that an individual made a malicious or vexatious allegation which is found to be untrue or is in any way personally involved in the malpractice, wrongdoing or omission, disciplinary action may be taken against them.

4. Wellbeing & Staff Council Support

Whistleblowing incidents can have a real psychological effect on all those involved - the whistleblower, the subject(s) of the whistleblowing, witnesses and the organisation as a whole. Independent and confidential support can help to address some of the personal emotional responses that can arise, such as any feelings of fear, anxiety, stress, low mood, an escalation of tension or conflict that an individual may experience as a result of 'Blowing the Whistle'. Tearfund's Wellbeing Team gives access to safe, confidential, non-judgemental support; including confidential one-to-one pastoral & chaplaincy support, counselling & psychotherapeutic service, personal debriefing; as well as a range of resources and tools to access directly via the Wellbeing Hub. Wellbeing support can be accessed by contacting wellbeing@tearfund.org

Requests for support or referrals to the Wellbeing team undergo a brief assessment which helps to better

understand the needs of the individual and to recommend the most appropriate support to them. Any referrals made by the Wellbeing Team to an external service provider (e.g. for counselling, debriefing or chaplaincy support etc) have a limited number of sessions for each service offered to the individual. In some circumstances, the limited number of sessions may need to be extended for an additional limited number of sessions but this will be done in agreement with the individual / investigation team or HR.

Staff Council are also available to provide support to and representation for staff members.
See the Staff Council hub for more details.

5. How to report your concerns

We hope that in many cases, staff members will be able to raise any concerns informally with their line manager or the HR team (HR Business Partner or The Head of People) either verbally or in writing. It may be possible to resolve the concern quickly and effectively without the need for further action.
However, where the concern is more serious and is related to one of the matters defined as Whistleblowing in section 1 above , or you feel that your line manager or the HR team has not addressed your concern, or you prefer not to raise it with them for any reason, you should raise your concern using one of the following options:

Whistleblowing email:
Send your concern to this email address: whistleblowing@tearfund.org which is monitored by The Head of People, the Head of Legal & Risk, the Rewards & Benefits Advisor, and the Global Safeguarding Manager.

Whistleblowing phone number:
Phone this number and state your concern: +44 020 3906 3898

Contact Safecall, the independent channel to report concerns:

- Safecall Phone: 0800 915 1571 - UK calls only. Staff calling from outside the UK will find the relevant local Safecall number on the Reporting Concerns page on Tearfund's website - https://www.tearfund.org/en/about_us/reporting_concerns/
- Safecall Website: www.safecall.co.uk/report

In your email/message please clearly state the facts and details of the concern. If the report involves a child or adult who may be put at further risk if their identity is revealed, do not disclose their name in the initial report. We will follow up requesting further details.

If the concern is about a member of the Board or the Executive Team, then the following email address must be used: ombudsperson@tearfund.org. Concerns received will be passed to the Board member who is appointed as Tearfund's ombudsperson.

If you do not have access to a computer or a telephone, you should raise your concern with the most senior member of staff in your specific location. Should your concern involve the most senior member of staff in your specific location, then you should inform another senior member of staff. This member of staff should pass the concern in an email as soon as possible to whistleblowing@tearfund.org

6. Next steps

Concerns received by email or by phone will be monitored by the Whistleblowing Team, who will then decide how the concern will be followed up.

All concerns raised at Tearfund are taken seriously. Prompt steps will be taken to consider all concerns and when appropriate, an investigation into the allegations will be undertaken in line with the appropriate procedures. For example, if a concern relates to abuse or exploitation it will be investigated in accordance with Tearfund's Safeguarding & PSEAH Policy. If the concern relates to an allegation of fraud, it will be investigated in accordance with Tearfund's Fraud, Loss and Bribery Policy.

The Group Director should be informed, unless implicated in the concern / report, if the concern / report relates to their Group. This will ensure that the Group Director is kept updated with what is going on and able to appropriately support / protect their staff.

Wherever possible, feedback on the results of any investigation will be given to the person who initially reported the concern. However, if the malpractice or wrongdoing concern is of a confidential/private nature or the evidence uncovered is sensitive, then it may not be possible to provide feedback detailing the specific actions that were taken to resolve the concern and this will be decided on a case by case basis. This would also include situations where an investigation has resulted in disciplinary action being taken.

If you have followed this procedure and still feel that your concern has not been properly addressed, it may be appropriate to report your concern externally - for example, to the Charity Commission, Health & Safety Executive, Information Commissioner's Office, or Fundraising Regulator. In this case, we recommend that you seek independent advice about the most appropriate way to report your concern.