



# Wide Horizons' Whistle-Blowing Policy

Reviewed: 30/05/2022

Date of Next Review: 31/03/2023

Safeguarding Officer: Aung Than ([widehorizons.safeguarding@gmail.com](mailto:widehorizons.safeguarding@gmail.com))

## I. Goal and Guiding Principles of Policy

Wide Horizons believes it is our responsibility to establish a clear policy and procedure which enables people to be able to disclose concerns about dangers or illegal acts that have a public interest that are committed by individuals within our organization.

In addition, Wide Horizons should provide a framework in which individuals can raise concerns about malpractice in a supportive atmosphere.

This policy applies to anybody who has dealings with Wide Horizons including staff, WH students, alumni, contractors, and community members.

Whistle-Blowing Policy shall be made publicly available on our website, and the procedure should be shared with all relevant third-parties. Support should be provided to anyone involved in this process with a disability or long term health issue to ensure they are able to take part fully in the process.

The Policy Documents should be reviewed on a yearly basis to ensure it is up-to-date and active.

## II. Whistle-Blowing Definition

Whistle-blowing can be defined as the disclosure of information, a perceived wrongdoing in an organization to individuals or entities that are able to act on the issues raised.

Whistle-blowing raises a concern about dangerous malpractice or illegal activities that have a public interest: such as malpractice, fraud, crime, danger, safeguarding or any other serious risk that could threaten primary actors, students, or colleagues or the organization's reputation.

If the incident is seen as internal and is not connected to public interest and safety, please refer to Wide Horizons' Procedure for Managing Complaints.

## III. Relevant Concerns for Whistle-Blowing

Any serious concerns you may have about Wide Horizons' activities, or the actions of staff members who work for the organization.

Examples of malpractice which you should report include, but are not limited to, the following:

- Corruption, bribery, or blackmail;
- Incidences of money laundering;
- Incidences of contracting with, or funding a terrorist organisation;
- Any circumstances which give rise to an enhanced risk, or suspicion of modern slavery practices or human trafficking;
- Fraud and financial irregularity;
- Abuse of position to obtain personal benefits, bias in contracts or recruitment.
- Endangering the health and safety of any individual;
- Endangering or abusing (either physically or mentally) children or vulnerable adult
- Incidences of bullying, harassment, or discrimination;
- Environmental damage;
- Any other criminal offenses;
- Safeguarding and safer recruitment practices;
- Concealing any of the above.

There will always be disagreements within a team, and practices and decisions in the workplace should be challengeable. This does not mean that all such matters should be reported.

It may be helpful to go through the following questions:

- Does this feel right to me?
- Does it appear reasonable?
- Would I feel comfortable justifying this to public scrutiny?

If you answer 'no' to these questions, you should report the concerns.

For concerns regarding safeguarding, it is not the responsibility of employees to decide whether abuse has taken place, however, concerns should be raised to the designated safeguarding officer who will initiate the procedure for dealing with suspected or actual incidents of abuse. (see Safeguarding and Child Protection Policy and Guidelines )

#### **IV. Who should Whistle-Blow**

Any individual who becomes aware of malpractice including staff, WH students, alumni, contractors, and community members in any part of Wide Horizons can make a report as described using the procedure below.

Every staff member has an obligation to report instances of suspected malpractice. In addition, there is also an obligation on the person to whom such a report is processed and acted upon following this guideline. Failure to report incidents or investigate a report will be also investigated for potential misconduct, and could lead to disciplinary action if evidence of dereliction of duty is identified.

Wide Horizons undertakes to treat all whistle-blowing reports as either confidential or anonymous.

## **Confidential Whistle-blowing**

A whistle-blower may choose to reveal his or her identity when a report or disclosure is made. In this case, Wide Horizons will respect and protect the confidentiality of the whistle-blower and gives an assurance that WH will not reveal the identity of the whistle-blower to any third-party where possible (sometimes it is not possible i.e cases investigated by the police, or the court orders disclosure).

## **Anonymous Whistle-blowing**

An anonymous whistle-blower chooses not to reveal his or her identity. Although the whistle-blower is guaranteed anonymity it does make the incident harder to investigate and it is more difficult to establish whether any allegations are credible and have been made in good faith. Therefore, it recommended whistle-blowers choose confidentiality rather than anonymity.

However, the choice between confidential or anonymous whistle-blowing is entirely that of the whistle-blower. Wide Horizons will treat each report equally and carry out an investigation to its best ability.

## **V. Protecting a Whistle-Blower**

Safety of the whistle-blower is of the utmost concern as accusations might cause the accused to retaliate or victimize the whistle-blower. Wide Horizons will do its utmost to protect the confidentiality/anonymity of the whistle-blower to ensure their safety and we advise the whistle-blowers to follow precautions with who they inform to maintain their confidentiality/anonymity.

To be protected, reports must be made in good faith, meaning the reasons for raising the concerns are honest. Even if the concern is revealed to be unfounded, if the concern was raised with genuine intention to prevent malpractice, then the whistle-blower shall be protected.

However, if the report is revealed to be malicious and the whistle-blower's intentions are proven to be deceptive or for personal gain, then any employees or students who have provided false information will be liable to disciplinary action and possible dismissal/expulsion.

Victimizing someone because they have raised a concern, or to deter them from doing so, is a serious disciplinary offense which, if proven, will be considered an act of gross misconduct and may result in summary dismissal.

If you raise a concern and are then victimized (or feel victimized), you can seek support through the **Safeguarding Officer** ([widehorizons.safeguarding@gmail.com](mailto:widehorizons.safeguarding@gmail.com)) or a member of the Senior Management Team.

## **VI. Whistle-Blowing Procedure**

If you become aware, directly or indirectly, of a practice or incident which causes concern, there are two options available:

1. Report through normal line of management; or

2. If this has already been done and no action has been taken, or if you feel unable to talk to your line manager, you may contact someone outside of line management, for example, the **Safeguarding Officer** or a member of the Senior Management Team.

The concern should be raised as soon as possible and can be submitted **either in writing or verbally**, however in writing is preferred as it will act as a lasting record of the concern.

The concern should clearly outline:

- A clear, detailed description of what the complaint is about, when it happened and who is involved.
- Relevant Dates
- Copies of any letters or emails related to the complaint.
- The Whistle-Blowers contact details - unless anonymous whistle-blowing (so we can follow up).

Any employee thinking of reporting a concern has the right to seek advice from one trusted colleague, however if a report is made you must disclose the name of the trusted colleague. The trusted colleague's name will be included in the report and they will also be informed that the matter is investigated and confidential.

Whistle-blowers who are concerned about possible reprisals if their identity is revealed should come forward to the **Safeguarding Officer** or a member of the Senior Management Team and appropriate measures can then be taken to preserve confidentiality.

In addition, the independent whistle-blowing charity, Protect, operates a confidential helpline. This organization is UK based but they can provide advice on whistle-blowing from other countries : (further contact details can be found on their website: <https://protect-advice.org.uk/>).

It should however be noted that it may, in some circumstances, be obvious who has raised the concern, or the investigation may lead to a point where the individual is required to give evidence. In such circumstances, where finding the truth is hindered by confidentiality, Wide Horizons cannot guarantee complete confidentiality of the reporting employee.

## **VII. Investigating Concerns**

Arrangements will be made to investigate a suspicion with sensitivity, in line with Wide Horizons Procedure for Managing Complaints. The **Safeguarding Officer** will ensure that the appropriate reporting procedure is followed so that suspected or actual cases of abuse are responded to appropriately and consistently, referred to the relevant law enforcement agency and statutory authority and that support is given to the vulnerable individual.

On receiving a report, an appropriate investigator will be appointed. The identity of the investigator will usually depend on the nature of the reported malpractice and this might be an employee of Wide Horizons or an appointed representative from outside the organization depending on the nature of the complaint and the people involved.

The person reporting the malpractice will be told the name of the investigator, how to make contact with the individual, and whether further help will be needed.

Wide Horizons will support the whistle-blower and take steps to protect him or her from reprisals and victimization. The whistle-blower may be asked to act as a witness to the investigation. Wide Horizons may consider providing independent external support to the whistle-blower if the concern is of a complex nature, or if the investigation is likely to be protracted or of a very sensitive nature.

The person(s) accused of malpractice will be informed of the accusation and, if necessary (if there appears to be some validity to the allegation), will be given the opportunity to respond.

If a decision is taken to move into a disciplinary process, the normal provisions of the disciplinary procedure, including the rights to a hearing and to appeal, will apply.

Where the person raising the concern is also involved in the malpractice, the fact that they have brought the matter to light will be considered in determining any subsequent disciplinary action.

After investigating all the facts, the investigator will inform the whistle-blower of their decision on what action will be taken. However, sometimes the need for confidentiality may prevent specific details of the investigation from being revealed or any action taken as a result. The whistle-blower should treat any information regarding the investigation as confidential.

If the whistle-blower has reason to believe that their suspicion has not been properly investigated, or that some material facts have not been taken into consideration in the investigation, they should raise their concerns with the Program Manager.

## **VIII. Disclosing Concerns Externally**

The purpose of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within Wide Horizons. However, in some circumstances it may be appropriate for the whistle-blower to report concerns to an external body such as a regulator.

Wide Horizons strongly encourages whistle-blowers to seek advice before reporting a concern to anyone external. The independent whistle-blowing charity, Protect, referred to earlier, operates a confidential helpline.

They also have a list of prescribed regulators for reporting certain types of concern.

## **IX. Malicious Reports**

Any employee or student who uses this policy to make malicious accusations, which they know to be untrue, will not be protected by this policy and may be subject to disciplinary action.

Any employee who discusses his / her suspicions with anyone other than one chosen trusted colleague (see earlier paragraph), or formally recognized independent whistle-blowing charity will not be protected by this policy and may be subject to disciplinary action.

## **X. Changes to this document**

Authority to alter the Wide Horizons' Whistle-Blowing Policy rests with the **Program Manager** ([widehorizons.myanmar@gmail.com](mailto:widehorizons.myanmar@gmail.com)) and final approval will be sought from the Senior Management Team. All team members are encouraged to provide input and suggestions but may not alter or change any part of the document without agreement.

The Wide Horizons' Whistle-Blowing Policy will be reviewed every year and updated as required, and the availability of updated versions will be communicated to staff. It is the individual employee's responsibility to ensure they are complying with the most current version of the policy.