

Practical Action

GLOBAL COMPLAINTS (WHISTLEBLOWING) POLICY

Version V1
Date September 2020
Scope All employees & anyone acting on our behalf
Review Date September 2023

Approval required from	Name	Date approved
Policy Owner:	Head of People & Culture	September 2020
Responsible Director:	Finance & Services Director	September 2020
Board approval		September 2020

Queries:	Contact the Policy Owner
Exceptions:	Contact the Responsible Director for permission

Big change starts small

Introduction

The Global Complaints (Whistleblowing) policy applies to all employees of Practical Action globally. Other individuals, related to the Practical Action's activities, are encouraged to use it and may include beneficiaries, consultants, contractors, volunteers, employees of partner organisations, or third party service providers.

This policy is intended to encourage and enable individuals to raise genuine concerns within Practical Action first rather than overlooking a problem or raising complaints outside the organisation in the first instance.

Concerns covered by this policy may relate to illegal, immoral, irregular, dangerous or unethical activity under Practical Action's control and could cover a broad range of matters, including mismanagement, fraud, terrorist activities or health and safety failures including¹:

- committing a criminal offence;
- failing to comply with a legal obligation;
- a miscarriage of justice;
- endangering the health and safety of an individual;
- environmental damage; or
- concealing any information relating to the above

Matters relating to individual employment arrangements should be raised through the internal Grievance Procedure, not this policy.

Concerns covered by this policy could relate to acts that have happened in the past, are happening now or are expected to happen in the future. For example a disclosure may include environmental damage that has happened, is happening, or is likely to happen.

Individuals are not expected to prove the truth of an allegation but there needs to be demonstrable and reasonable grounds for concern. Maliciously making a false allegation is a disciplinary offence. Individuals who are not sure whether to raise a concern through this policy may discuss the matter with their Line Manager or People and Culture contact.

No individual will be victimised for raising a matter under this procedure e.g. continued employment or opportunities for future promotion/training will not be affected because a genuine concern has been raised. Practical Action will consider any victimisation of an individual for raising a genuine concern as a disciplinary offence.

An instruction to cover up wrongdoing is also considered a disciplinary offence. If individuals are told not to raise or pursue any concern, even by a person in authority such as a manager, individuals should not agree to remain silent. They should report the matter to a director.

Anonymous Complaints

Practical Action encourages individuals to put their name to any complaints they make, however Practical Action will accept anonymous complaints and recognises that they may represent genuine

¹ in the UK, and for some complaints, reference should be made to relevant Whistleblowing legislation; contact a member of the HR team for more information

concerns. There may be reasons why the complainant does not want to disclose their identity; it does however mean that complaints will be more difficult to follow up, investigate and respond to.

How to raise a complaint

A concern can be raised orally or in writing. Individuals should report concerns at the earliest opportunity to allow action to be taken. Practical Action would normally expect an individual to raise a concern internally in the first instance and, if appropriate, through the line management structure.

If the matter is of a more serious nature, or where it is not appropriate to raise with the individuals line manager, or if the individual is not a staff member of Practical Action, individuals may use the organisations designated confidential externally provided service designed to deal with complaints. The individual should state at the time of reporting if they want to raise the matter in confidence.

Reporting Details

Telephone

A concern can be reported by calling the Freephone external service line. This service is offered 24 hours per day, 7 days per week, and 365 days per year. When calling the service line, an individual will be able to speak with someone who speaks the same language.

Country:	Telephone Number:
India	000 8000 0502 231
Kenya	0800 221 364
Malawi	704-526-1125 (reverse charge number)
Nepal	1-800-091-0105
Peru	0800 781 17
UK	0800 086 9962
Zimbabwe	(503) 495 -9859 (reverse charge number)
Bolivia*	A: 800-101-110 (English) / 800-101-111 (Spanish) T: (844) 955 1644
Senegal*	A: 800 – 103 – 072 (English) / 800 – 103 – 073 (French) T: (844) 955-1644
Bangladesh Sudan	Telephone line not available. Reports can only be made via the online reporting tool (see below)

*Bolivia and Senegal require 2 stage dialing to be completed to reach a communication specialist, this is due to the country not having a direct free phone line. For each call made the following steps must be taken:

1. Dial “**A**” (Access Code) number to get through to an automated switchboard.
2. When prompted, enter “**T**” (Telephone Number) for your country.

Online Reporting Tool

Individuals can report a concern through the external web reporting tool. This can be accessed through: <http://practicalaction.ethicspoint.com/>

How will the matter be investigated?

Once a concern is raised the individual will receive acknowledgement of receipt, normally within five working days. All complaints received will be passed to the Director of Finance and Services and the International Director. If the complaint relates to either of these individuals, the complaint will be directed to the Chief Executive. If the complaint relates to the Chief Executive, it will be directed to the Chair of Trustees.

Practical Action will then make preliminary enquiries to decide whether a full investigation is necessary. If a full investigation is necessary then, depending on the nature of the complaint, concerns will be either:

- Investigated internally (delegated to management or trustees appointed for that purpose)
- Referred to the appropriate external person (for example the external auditors, the Charity Commission, police or health and safety executive) for investigation.

To allow full investigation information regarding the complaint may need to be shared with other internal or external parties. Where appropriate, and subject to legal or other relevant constraints, Practical Action will inform the individual of the outcome of preliminary enquiries, investigation and action taken within 28 calendar days.

If misconduct is discovered as a result of an investigation under this procedure the organisation's disciplinary procedure will be followed, in addition to any appropriate external measures.

What if an individual is unhappy with the way Practical Action has dealt with a complaint?

If the individual is unhappy with the outcome of an investigation Practical Action would prefer that, where possible, the individual pursues their concern with the person who responded to their complaint in the first instance. If the individual is still not happy they may wish to raise their concern with an external organisation, such as the Charity Commission, a recognised Health and Safety body, the (relevant countries) Tax office or Police.