

## Whistleblowing Policy

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<p>This policy is a practical guide for everyone acting on behalf of Teach A Man To Fish to prevent behaviours that do not align with our Code of Conduct as well as bribery or corruption in our work.</p> <p>Inside it you will find useful guidance on how Teach A Man To Fish safeguards whistleblowers on issues around non-observance among staff of our Code of Conduct; Safeguarding and Child Protection Policy, corruption, fraud and terrorism.</p> <p>In the annex you will find the incident form for reporting purposes.</p> <p>As well as reading this Whistleblowing policy, you will receive training during your induction about how it relates to your work.</p> <p>Thank you for working with us to prevent inappropriate behaviours, bribery and corruption at Teach A Man To Fish.</p>	

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### 1. Policy statement

Teach a Man to Fish is committed to:

- Protecting staff and any other person for whom Teach A Man To Fish has a special responsibility from any form of harassment which might inhibit them from pursuing their work.
- Keeping Children and Vulnerable Adults safe
- providing the highest possible standards in terms of accountability, transparency and honesty.

We have a zero tolerance approach to any form of inappropriate behaviours, bribery, corruption and fraud amongst our staff, partners, volunteers or anyone representing Teach A Man To Fish with the exception of circumstances where someone's personal safety is at risk.

This policy should be read with:

- The Employee Handbook [Code of Conduct](#)
- The [Child Protection and Safeguarding Policy](#)
- The [Anti-Bribery and Anti-Corruption Policy](#)

It is the policy of Teach A Man To Fish to comply with all applicable U.K. laws and all applicable laws in countries that Teach A Man To Fish operates in, and to accurately reflect all transactions in Teach A Man To Fish's books and records. It is also our policy to require certain third-party intermediaries, downstream partners and schools who work on Teach A Man To Fish's behalf to comply with these same laws and practices.

## 2. Whistleblowing: reporting an act of misconduct, bribery or corruption

### How and who to report to

If you suspect any incidents of misconduct as described in the Code of Conduct, Child Protection and Safeguarding Policy or Anti-bribery and Anti-corruption Policy within Teach A Man To Fish or by schools or downstream partners it is our staffs' responsibility to report it as described below.

### No victimisation / detrimental action of whistleblower

A report of misconduct or concern may be made without fear of harassment, demotion, dismissal or disciplinary action if the person reporting was not involved in the incident.

A witness, individual providing information, or support person will not be disadvantaged in their role with Teach A Man To Fish for making a complaint or being involved in an investigation. Examples of victimisation or detrimental action include ostracising, demoting or dismissing a person.

It is unacceptable to victimise a witness, individual providing information, or support person who has given information on behalf of a complainant, where the complaint has been made in good faith.

Victimisation / detrimental action may be regarded as serious misconduct and may result in termination of employment. It may also have external legal implications for the person committing the victimisation / detrimental action.

### Vexatious complaints

Disciplinary action may be taken against any person who makes a complaint which is Vexatious. A vexatious claim or complaint is one (or a series of many) that is specifically being pursued to simply harass, annoy or cause financial cost to their recipient. Such a complaint may also have external legal implications for the complainant.

### External agencies

This policy is designed to resolve complaints and grievances within Teach A Man To Fish. However, nothing in this policy is intended to affect the right of a person to approach an external agency in relation to their complaint.

### Process for reporting

**Information on any incidents should be reported to your line manager.**

If you are unable to report to your line-manager as they are a suspect, or you feel uncomfortable,

you may report to any member of Senior Management. You may report the incident over phone, email or Skype but you must also fill in an incident form (see annex 1).

Any reported incident must be investigated further by a Senior member of staff in conjunction with the person filing the report.

### Investigating the incident (should take place within 10 working days of report)

If the perpetrator in the incident is not a member of Senior Management, the Senior Management team will lead the investigation. If the incident does involve a member of the Senior Management team then a committee would be created including Board members.

Next steps include:

- Identifying if misconduct has taken place and who was responsible
- Undertaking suitable disciplinary action should a staff member be involved.
- Reporting the matter to relevant authorities and to a senior person in another organisation if the person is from another organisation or downstream partner of Teach A Man To Fish
- Reporting the matter to an appropriate government department or agency in country
- Reporting the matter to legal authorities locally or in the UK
- Identifying any improvements to the TAMTF procedures

Teach A Man To Fish is committed to taking all appropriate corrective actions, including disciplinary, legal or other actions, in light of any findings of misconduct with respect to relevant individuals (including those who committed the actions and/or anyone who knew of such actions but failed to act), and take steps to review controls and protocols to identify and address any gaps or weaknesses in our processes and procedures.

In the case of inappropriate behaviours as described in the Code of Conduct in the [Employee Handbook](#) the investigation process is two tiered - an informal process and a formal process. In the case of inappropriate behaviours as described in the Child Protection and Safeguarding Policy and the Anti-Bribery and Anti-Corruption Policy the investigation process is always the formal process.

Allegations dealt with under the formal procedure will be subject to a thorough and prompt investigation within 10 working days of the issue being raised.

Country Manager/Head of Fundraising/SEC Global Programme Manager (or CEO in cases involving Senior Management)

[http://../09.%20Human%20Resources%20\(GOOD\)/Employee%20handbook/Employee%20Handbook%20Code%20of%20Conduct.docx](http://../09.%20Human%20Resources%20(GOOD)/Employee%20handbook/Employee%20Handbook%20Code%20of%20Conduct.docx) will identify the 'Investigating Officer' who is the member of staff who will investigate the allegation. In situations where there is no prospect of a conflict of interest this would normally be the staff member's line manager.

The Investigation will seek to determine the facts of the case.

**The investigation should, where possible, be completed within two weeks**, after which the findings will be reported to the CEO /SEC Global Programme Manager/ Head of Fundraising who will decide if there is a case to answer or not.

Where it is established that there is no case to answer, this will be confirmed in writing to the witness, the staff member and their line manager, and all associated documentation will normally be held on GDrive in a folder with restricted access (CEO, Policy Owner). In these circumstances, their manager should consider if any informal guidance for the staff member (or others involved) is appropriate.

Where it is concluded that there is a case to answer, the staff member will be invited in writing to attend a disciplinary meeting and will receive a copy of the Investigating Officer's report. The staff member will be given at least one week's notice of the hearing, which will normally take place within two weeks of notification.

### 3. Disciplinary Procedure

#### **Stage 2 - Disciplinary meeting (conducted within 10 working days of notification of need for a disciplinary meeting)**

The Chief Executive should normally chair the Disciplinary Meeting.

The Chief Executive will appoint two other members of staff to attend the meeting as part of the Disciplinary Panel.

The Investigating Officer will normally attend the meeting to present their findings.

A written record of the hearing will be produced and a copy provided to the staff member within one week of the hearing.

#### **Outcome of the Disciplinary Meeting**

When all of the evidence has been heard, the Disciplinary Panel will meet privately to consider the decision. The decision will, where possible, be conveyed to the staff member verbally that day by the CEO/SEC Programme Manager/Head of Fundraising, and confirmed in writing to the staff member and line manager within one week.

If the Disciplinary Panel decides to dismiss the allegations, all associated documentation will normally be held on GDrive with restricted access (CEO and Policy owner). In these circumstances, the line manager should consider if any informal guidance for the staff member (or others involved) is appropriate, dependent on the matter in question.

If the Disciplinary Panel accepts the allegations, then depending on the seriousness or frequency of the misconduct, disciplinary action may take one or more of the following forms:

- Written warning (see Annex 6)
- Final written warning including a statement that any further breach of discipline within the period of the warning may lead to dismissal (See Annex 7)
- Dismissal
- Another sanction, e.g. loss of formal office or demotion (as alternatives to dismissal).

Where the Chief Executive Officer /SEC Global Programme Manager /Head of Fundraising recommends disciplinary action, the letter of confirmation will include details of:

- The nature of the misconduct

- The nature of the disciplinary action to be taken
- The reason for the decision and factors taken into account
- The length of time any disciplinary warning will be active
- The likely consequences of further misconduct where appropriate
- Who the decision will be communicated to, e.g. the staff member's line-manager
- The timescale for lodging an appeal and how it should be made.

#### **Warning Periods**

Formal warnings given to staff members through the Disciplinary Policy will normally last for the periods of time specified below.

- A written warning – one year
- A final written warning – two years.

#### **Dismissal**

In cases where dismissal is the outcome decided upon, the staff member may be dismissed with pay in lieu of notice, or summarily without notice if the circumstances of the case are sufficiently serious to warrant it. Staff will not normally be dismissed for a first offence unless their actions amount to gross misconduct.

#### **4. Keeping incident reports on file**

All record of incidents or attempts to conduct fraudulent activities are kept in the incident form file held on GDrive with restricted access (CEO and Policy Owner) to help TAMTF to better manage its systems and staff.

**ANNEX 1**

**TEACH A MAN TO FISH ANTI-BRIBERY AND CORRUPTION INCIDENT REPORT FORM**

If you have knowledge of an incident that has occurred that suggests an act of bribery or corruption within TAMTF or one of its schools or partners, please complete this form to the best of your knowledge as promptly as possible. Please submit it to your Line Manager or if your line manager is involved, another Senior Member of Staff or Nik Kafka (CEO). You will be informed how Teach A Man To Fish is responding to this incident.

<b>Your name</b> _____	<b>Your job title</b> _____
<b>Your e-mail address and/or telephone number</b> _____	<b>Date, time of alleged incident</b> _____
<b>Name staff members involved in the incident</b> _____	<b>Location of alleged incident</b> _____

**Please describe the nature of the incident below (and on a separate page if required).**

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**Details of other staff members and community members who can verify the incident**

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## ANNEX 2

### TEACH A MAN TO FISH BULLYING AND HARASSMENT REPORT FORM

Bullying and harassment are serious and will not be tolerated. This is a form to help you report alleged bullying, harassment or intimidation if you have witnessed alleged bullying harassment or intimidation at Teach A Man To Fish. If you are a witness and wish to report an incident you can complete this form and return it to the Chief Executive in hard copy or by email.

<b>Name</b>
<b>Please describe what happened, what you saw and heard and how it made you feel</b>

<b>When did it happen? (date and time)</b>

<b>Where did it happen?</b>



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**Who was involved?**

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**Do you think anyone else saw or heard it?**

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<b>Has anything like this happened before? If it has, were the same individuals involved?</b>

<b>What do you want to happen now?</b>

<b>Is there someone you can talk to about this and be supported by?</b>

<b>Signed</b>	
<b>Date</b>	

## ANNEX 3

### TEACH A MAN TO FISH CHILD PROTECTION AND SAFEGUARDING INCIDENT REPORT FORM

If you have knowledge of an incident that has occurred that is against the Child Protection and Safeguarding Code of Conduct, or that a participant's safety might be in danger, please complete this form to the best of your knowledge within a maximum of 24 hours of the incident. The rest of the information can be filled out later. Please note for confidentiality reasons, the report should be written and signed solely by you. Please submit it to the Child Protection Officer (Christine Moser [christine@teachamantofish.org.uk](mailto:christine@teachamantofish.org.uk)). It will be held in a secure location and will be treated in the strictest confidence. You will be informed how Teach A Man To Fish is responding to this incident.

Your name	Your job title
Your e-mail address and/or telephone number	Name of alleged perpetrator
Name of participant(s)/victim(s) against whom the incident occurred	Gender of participant MALE/FEMALE
Age of participant	Address of participant
Guardians/carers of participant (if a child)	Date, time of alleged incident
	Location of alleged incident

Please describe the nature of the allegation below (and on a separate page if required). Try to answer the following questions:

*Was the abuse observed, suspected or divulged to you by another party?*

*What was/is the participant's physical and emotional state?*

*Has the participant said anything to you, and how did you respond?*

*Were there any other people involved? What response have you taken, if any, to the alleged incident? Which other parties, if any, are also aware of the alleged incident?*

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**Details of other staff members and community members who can verify the incident**

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