

SERIOUS INCIDENTS REPORTING POLICY

(Formerly the 'Whistleblowing Policy')

(HelpAge International)

Title	Serious Incidents Reporting Policy
Document type	Policy - compulsory
Applies to	All offices
Exceptions and Localisation	No exceptions
Available in (languages)	Full Policy - English Policy Briefs – English & other
SOP point of contact	Head of Human Resources
Date of issue	April 2018 and reviewed on January 2019
Next review	April 2020

Section		Page
1	Policy Statement	1
2	Purpose of the policy	1
3	Policy Overview	1
4	Protection for all persons raising concerns	2
5	How to raise concerns	3
6	HelpAge response to concerns raised	4
7	Outcomes of investigations	5
8	Related policies	5
Appendix		
A	Key contacts	n/a
B	Serious incident report form	n/a
C	Dissemination of the policy	n/a
D	Policy brief – How to report flowchart	n/a

1. Policy statement

HelpAge is committed to being an open, fair, honest and ethical organisation, accountable to all stakeholders, including the people benefiting from its work, employees, partners and donors.

HelpAge is committed to developing reporting processes and fostering a culture whereby employees, partners, beneficiaries and other persons can confidentially raise genuine and serious concerns.

2. Purpose of policy

The purpose of this policy is to reassure all persons that HelpAge welcomes the reporting of all forms of serious concerns. The policy:

- provides clear guidance on the type of concerns that could be reported under the policy and how to report them;
- summarises how HelpAge will respond to concerns raised;
- provides an assurance that HelpAge is committed to ensuring the confidentiality and protection of persons who raise concerns.

3. Policy overview

All forms of malpractice and wrongdoing can undermine HelpAge in the achievement of its mission, 'to promote the wellbeing and inclusion of older women and men and reduce poverty and discrimination in later life'. For example, malpractice and wrongdoing can:

- directly relate to the 'safeguarding' of beneficiaries, staff or other persons;
- give rise to other security risks;
- reduce the financial and other resources ultimately intended for older persons;
- undermine the reputation of HelpAge in the opinion of donors, government bodies, partners (e.g. who receive grants from HelpAge or specifically commissioned work by HelpAge) and staff, etc.;
- relate to breaches of the law.

Similarly, malpractice and wrongdoing can have a direct and adverse effect on other persons and organisations associated with HelpAge, e.g. staff, volunteers, partners, suppliers, donors etc.

Consequently, the Board of Trustees and the Executive Directors of HelpAge International are committed to:

- fostering an organisational culture in which all forms of malpractice and wrongdoing are unacceptable;
- making available clear and appropriate procedures under which any person can raise genuine concerns without fear of retribution.

The policy applies to:

- All staff, trustees, volunteers, interns, contracted consultants, affiliates, partners, beneficiaries, suppliers, members of the public, or persons otherwise associated with HelpAge, who choose to use it to report serious concerns in a confidential manner.
- All activities of HelpAge throughout the world including activities carried out on its behalf, in partnership with others, or in any way connected to its work
- All forms of potential wrongdoing; for example (but not limited to):
 - Exploitation and/or abuse (physical, sexual, psychological, financial or otherwise)
 - Fraud, misappropriation of funds, bribery and corruption
 - Health and safety risks
 - Criminal or any other unlawful acts

The key principles of the policy are to:

- Encourage a culture of openness, transparency and accountability;
- Make available confidential and appropriate reporting mechanisms so that anyone, in good faith, can report genuine concerns;
- Protect those who in good faith report genuine concerns and maintain the principles of confidentiality throughout;
- Investigate with appropriate urgency all reported cases of malpractice and wrongdoing in accordance with relevant HelpAge International procedures;
- Provide appropriate feedback to the person raising concerns.

4. Protection for all persons raising concerns

HelpAge recognises the fact that employees or other persons discovering a case of corruption and/or malpractice could be in a highly stressful situation and may

be very concerned about how they will be treated if they raise a concern.

To alleviate fears and to promote an atmosphere of openness and accountability:

- anyone using the policy to confidentially report any serious concern will not be treated unfairly or victimised in any way;
- the identity of any person reporting a concern under this policy will be kept confidential; except to the few people that may need to know as part of an investigation process;
- anyone who is the subject of a serious concern will be treated fairly, professionally and in accordance with relevant policies and legislation;
- any person raising a complaint or subject to a complaint under this policy will have right of complaint if the above mentioned protections are not kept.

Staff are encouraged to come forward with concerns in an open manner. Anonymous concerns may be difficult to investigate, as details and further concerns cannot then be checked with the person who raised the issues, and this may seriously limit the ability of investigators to pursue the concerns. We would not be able to protect the position of the person who raised the concern or provide any feedback.

Nonetheless, all disclosures, made anonymously or otherwise, will be reviewed but lack of information may limit the nature, extent and outcome of the investigation.

5. How to raise concerns

It is hoped and anticipated that in most circumstances you will feel able to share confidential and serious concerns with a HelpAge manager in your own country, preferably with the Country Director. It is equally accepted, that for any reason, you may choose to share your confidential and serious concern with the relevant regional office of HelpAge International or the London office. Whatever you choose, all matters will be treated equally, fairly and professionally. As part of this process, and to increase confidence in the system, country offices and regional offices are required to report (escalate) all such reporting to the London office.

Consider also if it would be more appropriate or effective to raise your concerns under a different policy, e.g. concerns about how you have been treated by your line manager should normally be dealt with under the 'Disciplinary & Grievance policy'. NB: Regional HR Managers or London HR can provide guidance on which policies are most applicable to each situation. If you decide to confidentially raise a serious concern under this policy:

- Act promptly - You are strongly encouraged to raise your concern at the earliest possible opportunity, as this will help in the investigation process.
- Do not investigate the matter - HelpAge will not expect you to prove that the concern raised is true, only that it is raised in good faith and that there are reasonable grounds for raising the concern. You will not be criticised

for doubts raised that turn out to be untrue but were made in good faith.

- Choose who to contact – any person can contact the dedicated contact person in the London office or the dedicated contact person in their region. In exceptional circumstances, e.g. if your concern is about the normal contact person or a director, it is acceptable to contact the Chief Executive or Chair of the Audit & Finance Committee. (see Appendix A – Key contacts).
- Choose how to raise your concern – concerns should preferably be made in writing, ideally by email, but other means are available, including a suggested 'Serious Incident Report Form' (see Appendix B). It is helpful if your concern is raised in English, but HelpAge will endeavour to accept reports in other languages.
- Information to provide - provide as much detail as you have available, including evidences where appropriate (whilst also noting the request not to investigate the matter – see above). E.g. your name; date of incident; summary of allegation; persons/organisations involved; any action already taken; any particular confidentiality, sensitivities or concerns of any type that you may have.

6. HelpAge response to concerns raised

- Acknowledgement– HelpAge will endeavour to acknowledge all concerns received under this policy within 48 hours. Where possible, HelpAge will also advise on the action that is intended and provisional timescales.
- Investigation – The person receiving notification of the concern will make an initial decision on the urgency of the matter and who else should be advised.
- Escalation – (as noted above, S.5) As part of this process, and to increase confidence in the system, country offices and regional offices are required to report (escalate) all reporting to the London office.
- Follow up - It is possible that at any stage during the investigation, HelpAge will request more information from you about the concern.
- Incident log – All offices are required to maintain a confidential log of all concerns reported to them. In addition, the Head of HR (London) maintains a master log of all confidential concerns that are reported under this policy.
- Reporting - The Trustees (Finance & Audit Committee) of HelpAge are advised of all relevant new cases and receive progress updates at least every 6 months thereafter. HelpAge is also obliged to report matters of fraud & bribery to the relevant donor, the UK Charity Commission, and other relevant national authorities. In all cases, the identity of the person who raised the concern is never reported.
- Confidentiality and protection –HelpAge is fully committed to maintaining the confidentiality of persons that report concerns under this policy and ensuring that they are not discriminated against in any way. (see section 4)

7. Outcomes of investigations

- Communication – As appropriate, the Finance & Audit Committee of the Board of HelpAge International, the UK Charity Commission, and relevant donor will be advised on the outcome of investigations. In addition, the person who raised the initial concern will be briefly advised on the outcome of the matter, should this be appropriate.
- Contract decision - Depending on the outcome of the investigation, the original contract terms (e.g. employment, supplier, partner), relevant legislation, and in accordance with other policies as appropriate, HelpAge will take due and reciprocal action. Ultimately, HelpAge may decide to terminate the contract of the employee or other associated person or organisation (including consultants, implementing partners and suppliers), or take any other remedial action as it considers necessary.
- Legal action - In all cases, HelpAge reserves the right to pursue legal action, e.g. to pursue financial recompense, or referral to the police without disclosure of the person who raised the concern. However, if it is a criminal investigation they may have to pass contact details on and confidentiality cannot be fully guaranteed.
- External whistleblowing - If in the unlikely event that internal reporting and investigation has not been sufficient to resolve concerns, it is recognised that the person raising concerns may then choose to raise the matter confidentially with an external body. This is sometimes referred to as 'whistleblowing'. (see Appendix A – Key Contacts)
- Malicious allegations – If it is concluded that the allegation was malicious or that it was a wholly inappropriate use of the policy, consideration will be given to treating it as a disciplinary matter (or other for non-staff members).

8. Related policies

All HelpAge International policies are available to all staff under the 'Policies & Procedures database'. Alternatively, documents can be specifically requested from HR or other HelpAge managers. The main policies and documents to be read in conjunction with the Reporting of Serious Incidents Policy are:

- Code of Conduct
- Disciplinary & Grievance Policy
- Protection Policy
- Equal opportunities and dignity at work policy
- Fraud and Bribery Policy
- This policy document also includes a 1-page 'Policy brief – How to report flowchart' (Appendix D) that is intended for sharing with partners, high value suppliers, beneficiary groups etc., and display on staff notice boards (see Appendix C – Dissemination of the policy)

Key contacts

London Primary contact	Head of Human Resources Email – concerns@helpage.org (This is a strictly confidential e-mail address that only the Head of HR (London) can access) OR Chief Executive Officer Email – ceo@helpage.org Or Trustees (Chair of Peoples Committee) E-mail: CPC@helpAge.org
Africa	Regional Director – Africa Email – RDafrika@helpage.org
Asia	Regional Director – Asia Email – Rdasia@helpage.org
Eurasia and Middle East	Regional Director – EME Email – RDEME@helpage.org
Latin America & Caribbean	Regional Secretariat Coordinator - LAC Email – RSCLAC@helpage.org
Queries Queries related to the policy	Human Resources Email – globalHR@helpage.org NB: this email is confidential to the regional office and London office HR managers.
Exceptional concerns	If your concern is about the normal person or a HelpAge director, it is permissible to contact the Chair of the Peoples Committee CPC@helpage.org
External Communication ‘Whistleblowing’	The HelpAge Confidential Reporting and related policies are intended to be suitable for all circumstances. It is also recognised and accepted that in exceptional circumstances, if all other internal processes have not provided a satisfactory outcome, the person raising concerns may feel the need to seek guidance and/or report matters externally. Suggested organisations in the UK are: Charity Commission - www.gov.uk/complain-about-charity Public Concern at work - www.pcaw.org.uk - Email – whistle@pcaw.co.uk - Tel – 020 7404 6609

Serious incident report form

Please use this suggested form to provide as much information as you can. Alternatively, if you do not complete this form please use it as a guide for the type of information that is likely to be useful.

1 – Your name	
2 – Date of reporting	
3 – Date of incident	
4 – Brief summary of allegation (max 50 words; see Q5)	
5 – Fuller description of allegation (e.g. date of incident, how identified, names of persons/organisations)	
6 – What action if any has already been taken by HelpAge to respond to the concern?	
7 – Are there any particular confidentiality or sensitivities that we need to be aware of?	
8 – Any other comments	

Dissemination of the policy

HelpAge is committed to achieving wide dissemination of this policy, both within and outside the organisation. This includes the sharing of a 'Policy brief – How to report flowchart' (Appendix D) which can easily be translated into local languages by local offices as appropriate.

- Translation – Regional Offices should identify which languages the Policy Brief (and potentially the whole policy also) should be translated into within their region and take responsibility for this happening.
- HelpAge offices – Every HelpAge office should have at least 1 copy of the 'summary brief' on a notice board, available to all persons.
- Directors & Staff – All Directors, staff, and interns should be provided with a policy brief and sign to confirm that they have read and accept the full policy, and that they can access the full policy at any time. The policy should also be included in their induction programme. Country and Regional Directors are responsible for maintaining records of signed policies etc.
- Other persons – All trustees, volunteers and consultants should be provided with a 'copy of the policy'.
- Affiliates – All affiliates should receive the full policy and policy brief, and be asked to sign to confirm that they have read and accept the full policy.
- Partners – All implementing partners should receive a policy brief with every Project Partnership Agreement and given the option of requesting the full policy. Awareness of the policy should be included in all project launch meetings.
- Suppliers – Preferred suppliers and suppliers under tender arrangements: The policy brief should be included in 'invitation to tender' and/or general documentation of agreed contracts.
- Beneficiaries – The policy brief should be given to community & beneficiary group leaders and displayed in prominent positions. All beneficiaries should be told the policy & policy brief exists and given contact details.
- Other – Serious incident reporting contact details and the policy brief should be available on the HelpAge website.

CONFIDENTIAL REPORTING OF SERIOUS INCIDENTS

This policy applies to:

All persons - staff, trustees, volunteers, interns, contracted consultants, affiliates, partners, beneficiaries, suppliers, and members of the public

All activities of HelpAge throughout the world including activities carried out on its behalf, in partnership with others, or in any way connected to its work

All forms of potential wrongdoing; E.g. exploitation (physical, sexual etc.) fraud, bribery, corruption, health and safety risks, or any other unlawful acts

If you **suspect any serious wrongdoing** in any way connected with HelpAge

Committed **by HelpAge**

Committed **against HelpAge**

- Act promptly - please act as soon as possible
- Do not investigate - HelpAge will not expect you to prove that the concern raised is true, only that it is raised in good faith
- Choose who - to report your concern to (or if you have any questions)

Choose who:

- Country Director OR
- Regional Director OR
 - RDAfrica@helpage.org
- London Office
 - Concerns@helpage.org
 - CEO@helpage.org

NB: offices are expected to report (escalate) all concerns to London. concerns@helpage.org is a confidential email for the Head of HR

Choose how:

- Preferably in writing (ideally email)
- Preferably English (not essential)
- Use the 'Report Form' (suggested)
- Provide as much detail as you have available, including evidences where appropriate,
- Provide your name/contact details, so that we can follow up with you

HelpAge response:

- HelpAge will acknowledge your concern (normally < 48 hours)
- HelpAge will investigate with appropriate urgency
- HelpAge will treat the matter as highly confidential and protect all persons who raise a concern in good faith (i.e. you will not be treated unfairly or victimised in any way)