



RAISING A CONCERN POLICY

(Formerly Reporting Serious Incidents Policy)

HelpAge

Title	Raising a concern Policy
Document type	Policy - compulsory
Applies to	HelpAge - Representatives
Exceptions and Localisation	No exceptions
Available in (languages)	Full Policy - English
SOP point of contact	Head of Human Resources

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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 concerns.

2. Purpose of policy

The purpose of this policy is to reassure all persons that HelpAge welcomes the reporting of all forms of 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 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):
 - Safeguarding concerns including, exploitation and/or abuse (physical, sexual, psychological, financial or otherwise), bullying and harassment.
 - Fraud, misappropriation of funds, bribery and corruption
 - Health, safety and security risks
 - Criminal or any other unlawful acts

Guiding Principles.

Transparent and Accountable

HelpAge will ensure that the process applied to and the possible outcomes of, the complaint/concern are clearly explained to those involved. HelpAge will give clear, evidence-based explanations, and reasons for any decisions made.

All complaints/ concerns will be logged and monitored, and anonymized data concerning complaints will be included in HelpAge annual reporting.

HelpAge will ensure that all feedback and lessons learnt from complaints and concerns contribute to service improvement and staff welfare.

Accessibility

HelpAge is committed to making the process of submitting a complaint/ concern as easy as possible by use of centralized reporting email addresses concerns@HelpAge.org

Fair

No HelpAge representative or whistleblower will be subjected to any detriment, victimization, harassment or bullying due to raising a concern. If a person is

receiving service from HelpAge or partner organization, raising a concern will not affect service delivery. HelpAge upholds a zero-tolerance policy to retaliation, abuse of power, bullying and harassment.

Confidential

All complaints and concerns will be processed, managed and stored in line with applicable policy. Information about a complaint or concern will be provided only to those who need to know for the concern to be actioned properly. Personal details about the complainant or alleged perpetrator will remain confidential.

Efficient and timely

HelpAge will acknowledge and aim to resolve complaints and concerns in a timely manner in line with the appropriate policy procedure's timeline.

4. Protection for all persons raising concerns.

HelpAge recognizes 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. The raising a concern policy guiding principles will be upheld to protect reporters from reprisals.

5. How to raise concerns

Where possible, complaints and concerns should be raised through HelpAge concerns reporting email address on concerns@HelpAge.org

Whistleblowing concerns of staff, trustees or any representative can also be raised with an appropriate supervisor, director, safeguarding advisor, or the Human Resources team and/or by using the relevant grievance or whistleblowing procedure according to the nature of the allegation.

Safeguarding concerns can also be raised in line with the relevant safeguarding policy procedure.

Complaints and concerns relating to fraud and bribery can be raised in line with the relevant procedure as outlined in the fraud and bribery management policy.

Complaints relating to safety and security can be raised through the appropriate channels as per the safety and security incident management policy.

Human resources concerns relating to workplace matters will be dealt with under the Disciplinary and Grievance policy.

To ensure oversight and effective monitoring and learning, the Head of Human Resources, Head of Operations and Head of finance will ensure that complaints raised through other mechanisms are logged on concerns@HelpAge.org

If you decide to confidentially raise a 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.

Anonymous Complaints and Concerns

HelpAge would rather receive an anonymous complaint or concern than not have it reported at all. However, it may be difficult for HelpAge to investigate the complaints and concerns made anonymously, especially if they are not adequately substantiated.

Where HelpAge is unable to investigate an anonymous complaint or concern, it will nevertheless be reviewed and logged.

Individuals concerned about being identified are encouraged to request confidentiality.

6. HELPAGE response to concerns raised.

- Acknowledgement– HelpAge will endeavour to acknowledge all concerns received under this policy within 48 hours.
- Triage – HelpAge triage committee comprised of Head of Human Resources, Head of Finance and Head of Operations will convene to triage the case and determine the category of concern then share with the relevant department for progression/ incident management of the concern.
- Investigation – The department receiving notification of the concern will make an initial decision on the urgency of the matter and who else should be advised based on the relevant policy. Where possible, HELPAGE will also advise the Complainant on the action that is intended and provisional timescales. A multi-pronged incident management panel will be set up if the concern falls under multiple categories.
- Escalation –As part of this process, and to increase confidence and accountability, all partners are required to report (escalate) all reporting to HELPAGE via concerns@HelpAge.org for tracking and monitoring.
- Follow up - It is possible that at any stage during the investigation, HELPAGE will request more information from you about the concern.
- Concerns log – The Head of HR 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, safeguarding concerns to 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.

7. Outcomes of investigations

- Communication – As appropriate, the Finance & Audit Committee of the Board of HelpAge 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.
- 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'.
- 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).

8. Related policies

All HelpAge 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 Raising a concern Policy are:

- Code of Conduct
- Safeguarding Policy
- Disciplinary & Grievance 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 C) 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)

General raising a concern 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.

For safeguarding concerns- make reference to the reporting form in the HelpAge Global Safeguarding Policy.

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

Appendix B

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 C) which can easily be translated into local languages by local offices as appropriate.

- 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.
- 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 – Raising a concern contact details and the policy brief should be available on the HELPAGE website.

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