

## Whistleblowing Policy

(Updated March 2020)

### 1. Introduction

Seenaryo is committed to maintaining an open culture with the highest standards of honesty and accountability, where employees or beneficiaries can report any legitimate concerns in confidence. Seenaryo takes all malpractice very seriously, and this document sets out the procedure by which employees or beneficiaries can report any concerns. Seenaryo's policy is to operate within both the UK's and the local country of operation's laws and regulations, and all employees/beneficiaries are expected to co-operate in this by adhering to all laws, regulations, policies and procedures.

**Whistleblowing** is where an employee or beneficiary raises concerns about underhand or illegal practices within his or her organisation or an associated organisation. These might also include violations of Seenaryo's Staff Code of Conduct.

### 2. Principles

This policy is intended to demonstrate that Seenaryo:

- will not tolerate malpractice;
- respects the confidentiality of staff raising concerns and will provide procedures to maintain confidentiality so far as is consistent with progressing the issues effectively;
- will provide the opportunity to raise concerns outside of the normal line management structure where this is appropriate;
- will provide a clear and simple procedure for raising concerns, which is accessible to all members of staff.

### 3. General

Employees may, in properly carrying out their duties, have access to, or come into contact with, information of a confidential nature. Their terms and conditions provide that except in the proper performance of their duties, employees are forbidden from disclosing, or making use of in any form whatsoever, such confidential information. However, the law allows employees to make a 'protected disclosure' of certain information. In order to be 'protected', a disclosure must relate to a specific subject matter and the disclosure must also be made in an appropriate way.

Seenaryo is committed to be compliant with the Bribery Act 2010. Seenaryo actively encourages a culture of honesty and openness and therefore all employees are required to bring up with their line manager or other designated person any issue that, in the employee's opinion, might constitute bribery or corruption. See the Bribery Act 2010.

Seenaryo offers protection to any employee or beneficiary who honestly and reasonably believes that underhand or illegal practices are taking place. Seenaryo undertakes to comply with all applicable laws relating to the prohibition of retaliation against good-faith whistle-blowers; see the Public Interest Disclosure Act 1988, which gives to workers whistleblowing protection against victimisation or dismissal.

Assuming the requirements of this policy have been met, Seenaryo undertakes to protect the employee or beneficiary from any personal claims and from any victimisation, harassment or bullying occasioned as a result of his or her disclosure. Seenaryo also undertakes not to initiate any disciplinary action. The aim is that the career of any employee (or participation of a beneficiary) should not in any way be harmed or hindered as a result of their disclosure (whether the item reported proves to be true or not, provided the reporting was carried out in good faith).

Any reprisal or similar action taken against a discloser because they have made a protected disclosure under this policy may be regarded as gross misconduct and may result in disciplinary action.

### **Examples of wrongdoing**

Seenaryo would expect all employees to report any of the following:

- a criminal offence
- a failure to comply with a legal obligation
- a miscarriage of justice
- the endangering of an individual's health and safety
- damage to the environment
- non-compliance with Seenaryo's Code of Conduct (some of which is covered above)
- deliberate concealment of information relating to any of the above.

Where the nature of a disclosure is not included in the above list, it should be made by way of the organisation's grievance procedure and not under this whistleblowing policy.

## **4. Procedure**

Employees: if an employee has reason to believe that underhand or illegal practices are taking place, the employee is encouraged to make his or her disclosure immediately to either their own line manager (who should report it to the Jordan/Lebanon whistleblowing contacts) or to the whistleblowing contacts directly.

Beneficiaries: a beneficiary can report to the staff-member working with them or - if this person is the subject of concern - then to the whistleblowing contacts directly. Please find the relevant contacts at the end of this section.

In both cases (employees and beneficiaries) the informed party will then investigate the alleged offence, in conjunction with – if appropriate - the Co-Directors, other trustees and any other employees. When disclosing any concerns, the discloser will not be expected to have absolute proof of malpractice but will need to be able to show the reasons for his or her concern.

An employee's failure to notify the organisation when reasonably aware or certain of an occurrence included in the list of categories of disclosures above is regarded by the organisation as misconduct. Failure to notify internally before notifying externally without good cause is also regarded as misconduct. Only if an employee has reasonable grounds for believing that those specific members of staff who would handle the investigation may be involved may contact be made to an outside body in the first instance.

Where requested, Seenaryo will keep the identity of the discloser confidential as far as possible. However, in certain circumstances the discloser may be needed as a witness. If this happens, the Co-Director will inform the discloser at the earliest opportunity. If the alleged offence is substantiated, appropriate action will be taken. The discloser will be informed of the outcome where reasonably practicable.

Please note all the contacts below speak English and Arabic.

Whistleblowing Contacts				
Country	Name & role	WhatsApp	Phone	Email
Lebanon	Victoria Lupton (Co-Director)	+44 7733 322827	+961 76 664 511	<a href="mailto:victoria@seenaryo.org">victoria@seenaryo.org</a>
Jordan	Lara Mclvor (Country Director)	+44 7999642812	+9627 9845 6048	<a href="mailto:lara@seenaryo.org">lara@seenaryo.org</a>
Any country	Lina Khatib (trustee)	+44 7960589612	+44 7960589612	<a href="mailto:LKhatib@chathamhouse.org">LKhatib@chathamhouse.org</a>

### The investigation

Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The discloser will be kept informed of progress and, whenever possible and subject to third party rights, will be informed of the resolution.

Timescales will depend on the complexity of the initial enquiry, but the discloser should receive feedback on the investigation and any conclusions reached within 10 working days. Seenaryo may use mediation or dispute resolution if necessary.

## **Post Investigation**

If the discloser is unhappy about the outcome of an investigation, he or she should make a further report to the CEO or trustee, and if there is good reason to do so, the concern will be investigated again. Any deliberate false or malicious allegations will be taken seriously and appropriate disciplinary action will be taken. If a discloser has a concern and is unsure whether this is the appropriate procedure for raising it or is unhappy about the final outcome of an investigation, he or she can contact the independent UK charity, Public Concern at Work for independent advice. Protect Advice line: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

## **Confidentiality**

Disclosers who wish to raise a concern under this procedure are entitled to have the matter treated confidentially, and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate to preserve confidentiality that concerns are raised orally rather than in writing, although disclosers are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity then the Police will in all cases be informed.

## **External Procedures**

Where all internal procedures have been exhausted, a discloser shall have a right of access to an external person/body. This may include (depending on the subject matter of the disclosure) the designated trustee board or the relevant authorities in their country.

It should be noted that under the UK's Public Interest Disclosure Act 1998, there are circumstances where a member of staff may be entitled to raise a concern directly with an external body where the staff member reasonably believes: i) that exceptionally serious circumstances justify it; ii) that Seenaryo would conceal or destroy the relevant evidence; iii) they would be victimised by Seenaryo

## **Malicious Accusations**

Where an employee acts in a malicious manner, the protection outlined above will not apply and the employee will be subject to disciplinary action which could result in summary dismissal for gross misconduct.

## **Protection from reprisal or victimisation**

No member of the staff or beneficiary will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and follow the procedures described in this policy.

## **Other relevant Contact Details**

Lebanon police: 112

Himaya (child protection NGO in Lebanon): 1 395 315

Jordan police: 911

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2/whistleblowing-list-of-prescribed-people-and-bodies>