

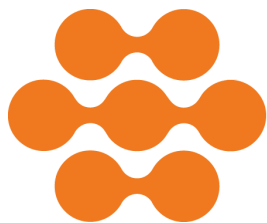
Whistleblowing Policy

1. Introduction

- 1.1. SEED Madagascar is committed to being open, honest and accountable and thus encourages open communication throughout the organisation.
- 1.2. However, SEED recognises that there may be times when staff and volunteers feel uncomfortable about raising concerns they have about colleagues, their managers or others involved with SEED due to a fear that they may be victimised, discriminated against or disadvantaged in some way as a result.
- 1.3. SEED's whistle blowing policy and related procedures exist to ensure a confidential channel is in place in which these concerns can be raised. Concerns raised through the whistle blowing policy can be raised anonymously.
- 1.4. SEED believes that a thorough and transparent framework for reporting and managing concerns is fundamental to operating ethically and ensuring that those that work for SEED, or who come into contact with its representatives, feel able to address concerns.
- 1.5. SEED recognises that a Whistle Blowing Policy is an integral part of a framework in which complaints and grievances can be reported and addressed, anonymously or by name and specifically offers a way of bypassing any line manager relationship if this poses a barrier, real or perceived. SEED believes that by establishing a robust framework it will be able to address concerns appropriately and in a timely manner thus promoting best practice and minimising uncertainty for staff and volunteers.
- 1.6. SEED will make every effort to keep the whistle blowers' identity confidential. However, there may be instances in which it will be necessary to disclose the identity of the whistleblower and may occur in connection with disciplinary or legal investigations or proceedings. Should an investigation lead to a criminal prosecution, it may become necessary for the whistle blower to provide evidence or be interviewed by the police. In these circumstances, the implications for confidentiality will be discussed with the person raising the concern.
- 1.7. The Trustees have overall responsibility for the whistle blower's policy across SEED Madagascar with the Managing Director and the Director of Programmes and Operations being accountable for implementing the procedures.

2. Scope

- 2.1. SEED's whistle blowing policy applies to all SEED Madagascar Trustees, staff and volunteers.
- 2.2. SEED's whistle blowing policy and related procedures are intended to deal with serious or sensitive concerns about wrongdoings. These relate to:
 - a criminal offence
 - a failure to comply with any legal obligation
 - a failure in the protection of children or at-risk adults from either actual or threatened abuse, exploitation, harassment, bullying or intimidation as defined under SEED Madagascar's safeguarding policies and procedures
 - a miscarriage of justice



seed madagascar

sustainable environment, education & development

- a health and safety risk to an individual
 - damage to the environment
 - or concealment of the above.
- 2.3. It is not necessary for individuals who raise the concern to prove the wrongdoing that is alleged to have occurred or is likely to occur.
 - 2.4. However, if an individual knowingly or maliciously makes an untrue allegation SEED Madagascar may choose to take appropriate disciplinary action against them. In cases where a criminal offence has been committed, individuals will not be protected by making a disclosure.
 - 2.5. This policy does not deal with any complaints staff may have about their employment. This should be dealt with through SEED's Complaints and Grievance Procedure.
 - 2.6. SEED's safeguarding policies and related procedures offer protection against abuse, exploitation, harassment, bullying and discrimination. This can be actual, attempted or threatened abuse by a person in a position of power who abuses this trust to the detriment of those more vulnerable, and includes, but is not limited to sexual abuse and exploitation.
 - 2.7. This policy is approved and endorsed by the Board of Trustees and is available to all staff and volunteers of SEED Madagascar.

3. Legal Framework

SEED's policy and related procedures have been developed within best practice guidelines set out by CHS Alliance and BOND and written in the context of the Public Interest Disclosure Act 1998 which protects employees who 'blow the whistle' on malpractices within their organisation.

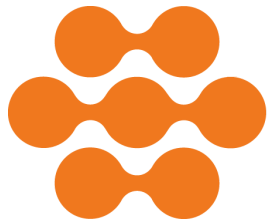
4. Key Definitions

SEED defines whistleblowing as the act of raising concerns about misconduct within an organisation or within an independent structure associated with it.

Further definitions regarding the nature of the concerns to be raised under whistleblowing may be found within SEED's safeguarding children and young adults, safeguarding at risk adults and the bribery and corruption policy and procedures.

5. Roles and Responsibilities

- 5.1. It is essential that all staff, volunteers and Trustees are aware of this policy, supporting procedures and any duties or responsibilities it places on them.
- 5.2. The Board of Trustees has approved this policy, retains an overview of reporting issues and has ultimate responsibility for ensuring serious concerns are handled within best practice throughout the organisation. The Board supports SEED's ability to function as an effective learning organisation in relation to any incidents, allegations and concerns.
- 5.3. The Managing Director and Director of Programmes and Operations have responsibility for ensuring procedures are in place for reporting and managers have responsibility to ensure that volunteers and staff are familiar with the content of this policy.



seed madagascar

sustainable environment, education & development

- 5.4. The Trustees, Managing Director and Director of Programmes and Operations hold responsibility to report concerns to the Charity Commission, local courts and British Embassy as appropriate.
- 5.5. Members of staff who raise concerns using the whistle blowing procedure will not be dismissed or be subjected to any detriment such as disciplinary action or victimisation as long as concerns have been raised in good faith. Staff or volunteers who victimise or retaliate against those who have raised concerns under this policy will be subject to disciplinary action.
- 5.6. All Trustees, staff and volunteers have a responsibility to report any concerns that they have concerning conduct within SEED Madagascar.
- 5.7. To achieve this aim, staff and volunteers need to be clear on the terms of their roles and competent and confident in their responsibilities in safeguarding matters.

6. Reporting

- 6.1. Due to the sensitive nature of concerns raised through the whistle blowing procedures, those concerns that staff and volunteers do not feel they are able to raise with their line manager should be taken to their line manager's manager. If this is still felt to be too sensitive, then the Managing Director, Mr Mark Jacobs (Mark@seedmadagascar.org) or the Chair of the Trustees, Ms Jessica Burston (Jessica.burston@seedmadagascar) should be contacted. In the event that any internal reporting of the concern is felt to be too sensitive, concerns can be reported to the Charity Commission.
- 6.2. The whistle blower may raise their concern verbally or via email and the whistle blower may maintain anonymity. If a concern is being raised the whistle blower must state that they are using the whistle blowing policy, include full details and if possible supporting evidence and declare whether they wish their identity to be kept confidential.
- 6.3. Concerns raised under this policy should also be escalated along the same reporting structure if the staff member or volunteer does not feel that their concern has been handled with sufficient gravitas.
- 6.4. Investigations performed under the whistle blowing policy should aim to be conducted, concluded and reported on within 7 working days. However, due to the complex nature of some investigations conducted under this policy, if the time required is likely to exceed this, this should be reported to the Managing Director and Trustees who should set an appropriate timescale to conduct a thorough investigation, make decisions and report on to all of those involved. In all circumstances SEED should aim to complete this process within 1 month.

7. Key Performance Indicators

- 7.1. To ensure that all staff and volunteers are aware of this policy and related procedures, it will be contained in the International staff handbook, discussed at orientation, be part of SEED's annual essential training and copies of a reporting summary displayed on the notice boards in offices.
- 7.2. Trustees have overall responsibility for this policy and maintain oversight through reports at the quarterly Trustee meetings. In the event of the whistle blowing procedures being used to report serious misconduct, or conduct that poses a significant risk to the reputation of SEED Madagascar, the HR and Risk subgroups of the Trustees, Director of Programmes and



seed madagascar

sustainable environment, education & development

Operations and the Managing Director as appropriate should be notified within 3 working days of the allegations being made and these groups will make the decision on whether to inform the full Board.

- 7.3. Reports of any investigation, resulting in disciplinary action or external reporting on concerns will be kept 7 years after the employee leaves the company.

8. Access to Policy

SEED's whistle blowing policy and summary can be found:

In the UK: on the shared drive under Governance/Policies and Procedures.

In Madagascar: on the drive under Governance/Policies and Procedures, in the International staff Handbook in Madagascar and a summary will be displayed on all office notice boards in English and/or French.

9. Adherence

Awareness raising will be tailored to the specific roles and conditions in which SEED Madagascar representatives work and will include an awareness of the policy, individuals' responsibilities and the reporting procedures detailed in the operational procedures.

The policy will be reviewed when any changes are made or every two years whichever is sooner.

10. Version Control

Version	Changes made	Date	Author of activity
Version 1.0	Draft submitted for approval to HR committee	25.5.2018	Lisa Bass
Version 2.0	Additional information added to key performance indicators section	29.6.2018	Lisa Bass
Version 2.1	Trustee details changed for contact information	4.5.2019	Lisa Bass
Version 2.2	Review and timescale of investigations added	20.2.2020	Lisa Bass
Version 3	Review of definitions to include signposting to further definitions on safeguarding and B and C – sections 2.6 and 4	20.11.2020	Lisa Bass
Version 4	Change of Chair, contact details and ownership of document	19.8.2022	Lisa Bass



seed madagascar

sustainable environment, education & development

	Clarification of wording on whistleblowing extending to those outside of SEED Update on where to find policy and summary		
Version 5	Review and edit of policy and additional of review every two years	24.1.2024	Lisa Bass
Version 5.1	Agreed by Board of Trustees	12.3.2024	Lisa Bass

11. Document Governance

Document owner (name)	Title
Jessica Burston	Chair of Trustees
Related procedure document owner (name)	Title
Lisa Bass	Director of Programmes and Operations