

WHISTLEBLOWING POLICY

Approved by Board: 31 August 2018

Review: August 2019

Business for Development is committed to operate on a fair and ethical basis in all its activities. To ensure this stance is maintained Business for Development provides security to ensure any wrongdoing can be raised without fear of retribution.

Business for Development's Whistleblowing Policy provides a safe and secure avenue to raise genuine concerns of wrongdoing. The Whistleblowing Policy procedures are available to any person or organisation dealing with Business for Development, including Board Members, Staff Members, Volunteers, Consultants, Partners, Donors, Beneficiaries and other Stakeholders.

DEFINITIONS

Whistleblowing is the disclosure by or witness of actual or suspected wrongdoing in an organisation that reveals fraud, corruption, illegal activities, gross mismanagement, malpractice or any other serious wrongdoing.

A **Whistleblower** is a person who reports serious wrongdoing in accordance with this Policy.

Wrongdoing includes, but is not limited to:

- Breaches of legal obligations (including negligence, breach of contract, breach of administrative law);
- Criminal offences as defined under legislation;
- Mismanagement or unauthorised use of funds;
- Actual or suspected fraud or corruption;
- Not acting in the best interest of the firm or the client
- Disclosures related to miscarriages of justice;
- Health and safety risks, including risks to the public as well as other employees;
- Damage to the environment;
- Sexual or physical abuse, or bullying;
- Unethical conduct;
- Concealment of any of the above.

All Board and Staff Members have an obligation to immediately report a suspected wrongdoing to the CEO or COO for investigation.

The organisation recognises the need to be fair to both the Whistleblower and the organisation or person against whom the allegation has been made.

A Whistleblower may submit an anonymous allegation under this Policy.

WHISTLEBLOWING POLICY AND PROCEDURES

Business for Development's Whistleblowing Policy and Procedures are detailed below:

- All allegations of wrongdoing will be raised with the CEO or COO unless they are involved, in which case the issue should be raised with the Board Chair.
- The Whistleblower must clearly outline the allegation and must disclose any relevant personal issues or involvement in the matter.
- The CEO/ COO/ Board Chair will appoint an Investigating Officer, who will investigate the matter promptly and thoroughly.
- An assessment will be completed confirming if a wrongdoing has taken place, and if so, what corrective action should be taken.
- The Whistleblower will be kept informed of the progress of the investigation and the results, unless the allegation was made anonymously.
- All matters raised under this policy are to be reported to the Board.

Business for Development commits to the following:

- A Whistleblower who raises a matter in good faith will not be subject to any detrimental or retaliatory action.
- The Right of the Whistleblower to speak freely and honestly will be protected.
- The identity of the Whistleblower will be protected where possible.
- A Whistleblower may face disciplinary action if they are implicated in the wrongdoing or they raise deliberately false allegations.
- The person against whom an allegation is made will be informed of the details of the matter and of the outcome of the assessment following the investigation of the matter.
- The person against whom an allegation is made will have the opportunity to answer the allegations during the investigation process and their responses will be fairly set out in the assessment report.
- The person against whom an allegation is made will be treated fairly at all times.
- All information on the matter will only be released if an external investigation, including the involvement of law enforcement agencies, is deemed necessary.
- All those involved in the matter must maintain confidentiality at all times.
- All records regarding the matter will be stored securely and held indefinitely.