

Saana Consulting

Whistleblowing Policy

Purpose

At Saana, it is vital that everyone who works for us maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. If an employee, partner, consultant or contractor or any third party has any genuine concerns about malpractice at Saana, we wish to encourage them to communicate these without fear of reprisals and in the knowledge that they will be **protected from victimisation and dismissal**.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

Malpractice includes (but is not limited to) the issues listed below:

- Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
- A failure to comply with any legal obligations
- Sexual misconduct, including sexual abuse, harassment or exploitation (see Saana Safeguarding Policy), including any engagement in transactional sex and sexual relations with under 18s.
- Abuse or exploitation of children, vulnerable adults or beneficiaries (see Saana Safeguarding Policy as above)
- Breach of Saana policy
- Abuse of position
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behaviour
- Activity which would bring the organisation into serious disrepute
- The deliberate concealment of information relating to any of the matters listed above

If you have a genuine concern and have a reasonable belief it is in the public interest, even if it is later discovered that you are mistaken, under this Whistleblowing Policy you will not be at risk of losing your job or from suffering any form of retribution as a result. This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously will have disciplinary action taken against them.

Malpractice is not a complaint about the performance and behaviour of a manager or other work colleague directly towards you as an employee or associate personnel. Such complaints should be directed for action to Saana's management teams under its Staff Handbook policies and procedures. This Whistleblowing policy and procedure is not intended to replace Saana's Grievance Procedures, which continues to be the appropriate way to raise personal issues and grievances relating to your employment or contract.

If you genuinely believe that the actions of someone who works for Saana could lead to or has resulted in malpractice, please follow the procedure below.

1. Raise the matter in writing or via email with the Managing Director or Director for Results & Quality, who will inform you of appropriate next steps. If you feel that you are unable to raise the matter with either of the Directors, you may submit an email to concerns@saana.com which will direct the concern to an Associate Director who is not involved in the day to day management of Saana and will be able to inform you about the necessary next steps.

At the point of raising a concern it would be useful for you to share information describing:

- Whether anyone is at immediate risk of harm?
- What happened? If possible make note of dates, times, places, people.
- Who is involved?
- How do you know about it?
- When were you first concerned about it?
- Have you told anybody about it?
- Was any action taken?

As a next step, the Director should (as appropriate and respecting confidentiality):

- Report incidents of theft, fraud, or corruption immediately
- Report Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any Saana representative
- Report any other incidents of malpractice in the workplace

2. A decision will be made on whether it is appropriate to handle such complaints under this policy. Where not appropriate, the complainant will be informed and their permission sought to divert the issue to the appropriate policy and procedure.

3. When matters are reported relating to Fraud, Bribery and Corruption, Saana's Anti-Corruption and Bribery Policy will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

4. When matters are reported relating to Safeguarding, Saana's Safeguarding Policy will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

You will be notified once the matter has been resolved, but outcomes are subject to confidentiality and may not be communicated.

Saana will take appropriate action, which may end in dismissal, in accordance with the relevant procedure against any employee, volunteer or consultant who:

- Has been found to be victimising another individual for using this procedure, or deterring them from reporting genuine concerns under it.
- Made a disclosure maliciously that is known to be untrue or without reasonable grounds for believing that the information supplied was accurate.

Frequently asked questions

What if the Director or line manager is involved in the alleged malpractice in some way?

If the Director or line manager is involved in the alleged malpractice in some way, the matter should be raised with the concerns@saana.com email address that is overseen by an Associate Director not involved in the day-to-day management of Saana.

Can the disclosure be made anonymously?

You are strongly encouraged not to make anonymous disclosures as details and further concerns cannot then be checked with you and this may seriously limit the ability of investigators to pursue your concerns. Nonetheless, all disclosures, made anonymously or otherwise, will be reviewed but lack of information may limit the nature, extent and outcome of the investigation.

Who will conduct the investigation?

Normally an independent person from within Saana will be appointed. On rare occasions, or for complex cases such as safeguarding, external investigation support may be sought.

What if the matter involves a criminal offence?

The issue may also be reported to the police if a criminal offence, such as fraud or theft, or sexual assault has been committed.

What if the matter is a complaint about the performance or behaviour of a manager or colleague against me?

Such complaints will be directed for action to the appropriate HR policy under unless the concerns relate to concerns of sexual misconduct or other forms of malpractice listed in this policy.

Reporting complaints to DFID

If any staff, associate or agent has any suspicion of malpractice (for example, sexual harassment, abuse or exploitation) in the first instance they may wish to report in writing any complaints, concerns and incidents regarding threatened or actual misconduct to Saana using the contact details provided above.

Misconduct for any DFID-funded activities can also be reported to DFID through reportingconcerns@dfid.gov.uk or +44 (0)1355 843747, and where necessary, the Appropriate Authorities.