



# WHISTLEBLOWING POLICY

*Since 1947 the International Fellowship of Evangelical Students (IFES) has existed to awaken and deepen personal faith in the Lord Jesus Christ and to further evangelistic work among students throughout the world. This mission arose from our shared beliefs as expressed in our Doctrinal Basis. The IFES Board has approved this policy in order to ensure that we pursue our mission in a manner that brings honour to God, respecting the legal requirements placed on our organisation and seeking to model good practice to all those with whom we work.*

## INTRODUCTION

IFES expects all our staff to conduct work and ministry at all times with the highest standards of integrity and honesty. It is important to us that any fraud, misconduct or wrongdoing by IFES staff is reported and properly dealt with. We therefore encourage all individuals to raise any concerns that you may have about the conduct of others in the organisation or the way in which the organisation or ministry is run. This policy sets out the way in which you may raise any concerns and how those concerns will be dealt with.

## AIM

The aim of this policy is to:

1. enable and encourage staff members to raise genuine concerns about possible wrongdoing within IFES without fear of reprisal and to reassure them that such matters will be dealt with seriously and effectively by IFES internally;
2. allow IFES to take action against any staff member who makes allegations in bad faith and/or publicly discloses information when it is unreasonable for them to do so in line with the IFES disciplinary and grievance procedure.

This policy is separate from the IFES grievance and disciplinary procedures which relate to general concerns a staff member may have about their own personal circumstances. This Whistleblowing Policy is designed to ensure that concerns about possible illegal or dangerous activities, or forms of malpractice are brought swiftly to the attention of senior management. These may not necessarily be related to the whistleblower's area of work.

## APPLICATION

This policy applies to all IFES staff members, in permanent or temporary employment.

If you believe that any of the following:

- a criminal offence (including fraudulent and corrupt behaviour such as theft, fraud or malpractice)
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any other legal obligation
- concealment of any of the above

is being, has been, or is likely to be committed you can raise your concerns. You do not need to have proof - a reasonable belief is sufficient. You are not responsible for investigating the matter – it is the responsibility of IFES to ensure that an investigation takes place.

Any staff member who makes such a protected disclosure has the right not to be dismissed, disadvantaged, or victimised, because he/she has made a disclosure.

IFES encourages staff to raise their concerns under this procedure in the first instance. If you are not sure whether or not to raise a concern, you should discuss the issue with your supervisor.

## PROCEDURE

### WHO TO DISCLOSE TO

In most cases, you should raise any concerns internally within IFES.

An informal approach to your supervisor will be treated in the strictest confidence. It will not result in a report to anyone within IFES without your agreement, except where your supervisor believes that the issues raised are so serious that further action may be required. Where this is the case, your supervisor will refer it to a more senior person.

If you feel it is inappropriate to raise your concerns with your supervisor (for example, if your concerns are about your supervisor's actions, or if they are so serious that they should be escalated to someone at a more senior level within IFES), then you should speak to an appropriate more senior member of staff.

If you are unhappy about the way in which your concerns have been addressed or resolved, you should refer the matter to the Chair of the IFES Board.

If you feel it is inappropriate to raise your concerns directly with anyone who is part of the day-to-day management of IFES, then you may contact the Chair of the Board.

As a staff member, you must not approach individuals involved in your disclosure directly or attempt to investigate the matter personally.

Disclosures to the press will not be considered reasonable. They will constitute misconduct and will be treated as a disciplinary matter in accordance with the IFES disciplinary and grievance procedures.

### DEALING WITH DISCLOSURES

All staff should feel able to put their name to the allegations they raise as concerns expressed anonymously are more difficult to investigate. If you raise a concern anonymously, depending upon the circumstances, it may still be possible for others to work out your identity. If you then suffer reprisals, it may be difficult to demonstrate that this has been a result of you raising your concern.

The action taken in response to a disclosure will depend on the nature of the concern. Matters raised could result in:

- no action required
- action taken under other IFES policies and/or procedures
- an internal investigation under this policy
- a referral to the police
- a referral to IFES external auditors
- a referral to the Charity Commission

The responsible person to whom the disclosure is made will:

- make a detailed record of the disclosure
- ask you to provide a written statement describing the precise nature of the allegations

When they receive your written statement, they will decide whether any further action may be required. Where it is, they will refer it to the appropriate person and write to you within five

working days of making that decision to acknowledge receipt of your complaint, provide information on who it has been referred to and details of who you should contact if you have any further questions.

Where further action is required, this will typically begin with an internal investigation. The internal investigator will be an Associate General Secretary, the General Secretary or a Board member (as appropriate). However, IFES may decide instead to arrange for a suitably qualified independent professional to undertake the investigation.

During the investigation, the staff member who reported the disclosure may be called upon for interview. They will also be given appropriate progress updates made during the investigation, bearing in mind the need to respect the confidentiality of other staff as well.

Once the investigation is complete:

- The staff member will be given a prompt and thorough explanation about the result of the investigation and any action IFES is likely to take as a result
- Where the allegation is deemed to be of a serious nature, an appropriate report will be submitted to the Board
- Any action which the investigator decides is required will be taken

IFES recognises that there may be matters which cannot be dealt with internally and external authorities may need to become involved, such as the police or the Charity Commission. Where this is necessary, IFES reserves the right to make such a referral without the reporting staff member's consent.

IFES will not tolerate any staff being disadvantaged as a result of making a disclosure in good faith. If you believe that you been disadvantaged by anyone within IFES for this reason, you must inform the Chair of the Board and appropriate action will be taken to protect you from reprisals.

If anyone should try to discourage you from coming forward to express a genuine concern, IFES will treat this as a disciplinary matter.

Any staff member who, in good faith, makes allegations that turn out to be unfounded will not be penalised for being genuinely mistaken.

Policy developed by: HR department

Policy approved by: IFES Board

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