

WHISTLEBLOWING POLICY

Version 2.0 Approved by the Board of Renewable World on 21st August 2018

1. AIMS AND SCOPE OF THIS POLICY

1.1 Renewable World (RW) is committed to the highest possible standards of ethics, integrity, honesty and conduct. However, RW recognises that incidents of workplace malpractice may arise and that such matters are of serious concern. By encouraging a culture of openness and accountability, RW believes that it can help prevent such incidents occurring. The aim of this policy is to ensure that all staff feel confident that they can raise matters of genuine concern in good faith without fear of being disloyal to colleagues or to RW, or for fear of being subjected to harassment or victimisation.

1.2 This policy applies to all RW's personnel. (In this policy, personnel include but are not limited to all employees, officers, volunteers, consultants and contractors).

1.3 This policy does not create any contractual rights and does not form part of any contractual relationship between RW and any of its staff or any third party. RW reserves the right to amend this policy at any time, omit stages of the procedure set out below or apply such other procedures as, in its absolute discretion, it deems appropriate in the circumstances.

1.4 The Relevant Persons within RW for the purposes of this policy are Chief Operating Officer (COO@renewable-world.org) and Chair of Trustees (chair@renewable-world.org).

2. WHAT IS WHISTLEBLOWING?

2.1 Whistleblowing is the disclosure of information which relates to actual or potential wrongdoing or danger in the workplace. This may include:

2.1.1 criminal activity;

2.1.2 failure to comply with a legal obligation or regulatory requirement;

2.1.3 a miscarriage of justice;

2.1.4 danger to the health and safety of any individual;

2.1.5 damage to the environment;

2.1.6 conduct likely to damage RW's reputation or financial wellbeing;

2.1.7 improper conduct of clients or related third parties;

2.1.8 bribery;

2.1.9 financial fraud or mismanagement; or

2.1.10 the deliberate concealment of any information related to any of the above matters.

2.2 A whistleblower is a person who raises a genuine concern relating to any of the matters listed in paragraph 2.1 above. The Employment Rights Act 1996 (applicable in the United Kingdom) sets out how employees and workers should disclose such concerns and the legal protection which may be available to whistleblowers. If you have any genuine concerns related to suspected or actual wrongdoing or danger relating to any of RW's activities you should report it under this policy.

2.3 If your concern is specifically related to:

2.3.1 money laundering, please refer to RW's Money Laundering Policy or contact the Company Secretary or cosecretary@renewable-world.org); or

2.3.2 a complaint about your personal circumstances, please raise it as a grievance, or under RW's Anti-bullying and Harassment Policy as appropriate.

2.4 In any case if you are unclear as to whether your concern falls within the scope of this policy, please take advice from an appropriate Relevant Person.

3. RAISING A WHISTLEBLOWING CONCERN

3.1 RW recognises that you may not feel comfortable discussing a concern falling within the scope of this policy with your line manager. If you do feel unable to talk to your line manager, please raise your concern with a Relevant Person who will either deal with the matter directly or designate an appropriate person to do so.

3.2 You can raise your concerns either orally or in writing. You should state that you are making a disclosure under this procedure, and whether you wish your identity to be kept confidential.

3.3 The person to whom you make your disclosure will invite you to a formal meeting to decide what action needs to be taken. You may be required to put your concern in writing and/or clarify your concerns before the meeting.

3.4 You are entitled to be accompanied to this meeting by a colleague who will be asked to respect the confidentiality of your disclosure and any subsequent investigation.

4. INVESTIGATIONS

4.1 So far as is reasonably practicable, RW is committed to investigating disclosures fully, fairly, promptly and confidentially. The length and scope of the investigation will depend on the subject matter of the disclosure. (An investigator will be appointed by the Chair of Trustees who will be another Trustee or a senior member of staff unconnected with the disclosure). In most instances, the person responsible for the investigation will carry out an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information. In any event a report will be produced and in the usual case copies will be provided to the Trustees of RW.

4.2 To the extent appropriate, you will be kept informed of the progress of the investigation. However, the need for confidentiality may prevent RW from giving you specific details of the investigation or actions taken.

4.3 If you are dissatisfied with the investigation or its conclusion you may raise this with the Chair of Trustees of RW (chair@renewable-world.org). You should also refer to the section on external disclosures below.

4.4 Where appropriate, RW will refer matters to external authorities. RW may need to make such a referral without your knowledge or consent.

5. PROTECTION FROM DETRIMENT

5.1 If you raise a genuine concern in good faith in accordance with the terms of this policy, you should not suffer any detriment as a result of having raised such a concern. If you believe that you have suffered any such treatment you should inform a Relevant Person as soon as possible. If the matter is not remedied you should raise it formally using RW's grievance procedure.

5.2 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action, up to and including dismissal.

5.3 While RW encourages you to raise any genuine concerns you may have, RW will take disciplinary or other appropriate action up to and including dismissal, against any individual who abuses this policy by making false allegations vexatiously, maliciously or for personal gain.

6. CONFIDENTIALITY

6.1 RW will make every effort to ensure that your identity will not be disclosed at any time, unless it is necessary for the purpose of the investigation or to comply with a legal or regulatory obligation. If it is necessary to disclose your identity, RW will, where possible, inform you of this fact in advance.

6.2 To ensure that no investigation is jeopardised you will also be expected to keep the fact that you have raised a concern under this policy confidential unless and until you are informed otherwise.

6.3 Concerns raised anonymously may be considered by RW taking into account the seriousness of the issues raised and the credibility of the concern.

7. EXTERNAL DISCLOSURES

7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

7.2 In addition to raising a concern falling within the scope of this policy by following the procedure set out in paragraph 3 above, staff involved in work funded by The Department for International Development may immediately contact the counter fraud and Whistleblowing Unit (CFWU) at fraud@dfid.gov.uk or on +44(0) 1355843747.

7.3 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator or a law enforcement agency. It will very rarely, if ever, be appropriate to alert the media. If you have followed the procedure set out in this policy and you do not believe that RW has addressed your concerns appropriately, you may wish to consider raising the concern with an external body. RW encourages you to seek independent advice before raising the concern with an external body, since in order to obtain statutory protection as a whistleblower when making an external disclosure, you must fulfil certain conditions. Such advice can be obtained from Public Concern At Work (an independent whistleblowing charity) which operates a confidential helpline and can be reached on: +44 207 404 6609, or by email: whistle@pcaw.org.uk.

8. RESPONSIBILITY

All Trustees of RW and personnel are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware. If you have any questions about the content or application of this policy, you should contact a Relevant Person (see s1.4 above) to request training or further information.