



Whistleblowing Policy

(Disclosure of Malpractice in the Workplace)

Lead Trustee – Pratima Dattani

Last reviewed August 2025

Next review August 2026

This policy applies to all stakeholders of Advantage Africa including Trustees, staff, partners and volunteers. Any person not connected with Advantage Africa can also report malpractice concerns using these procedures.

1. Purpose

At Advantage Africa, it is vital that everyone who works for us maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. If a member of staff, volunteer or associate (partner, consultant or contractor) has any genuine concerns about malpractice in the workplace, we wish to encourage and support them to communicate these without fear of reprisals or retaliation and in the knowledge that they will be protected from victimisation and dismissal. Therefore, staff, volunteers and associates will be made aware of the expectations, safeguards and procedures within this policy at the time of their recruitment / engagement, and through subsequent refresher training.

2. What Constitutes Malpractice?

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

- Financial wrongdoing including theft, bribery, fraud, money laundering or aid diversion.
- Sexual misconduct, including sexual abuse, harassment or exploitation (see Advantage Africa's Safeguarding Policy).
- Abuse or exploitation of children, at risk / vulnerable adults or beneficiaries (see Advantage Africa's Safeguarding Policy).
- Bullying, coercive behaviour or abuse of position.
- A failure to comply with any legal obligations.
- Danger to the health and safety of individuals or damage to the environment.
- A serious breach of any other Advantage Africa policies.
- Activity which would bring the organisation into serious disrepute.
- The deliberate concealment of information relating to any of the matters listed above.

Note - Malpractice is not a complaint about the work performance or effectiveness of a manager, work colleague or associate. Such concerns should be raised through Advantage Africa's HR policies and procedures.

3. Procedures for Reporting and Investigating Malpractice (Process for Whistleblowing)

If you genuinely believe that the actions of someone who is working with Advantage Africa constitute malpractice, you should raise the matter with Advantage Africa's Director by telephone on 01234 711005 or email on andrew.betts@advantageafrica.org. If you feel that you are unable to raise the matter with the Director for any reason, you should raise it with another senior colleague or an appropriate Trustee.

This policy underpins Advantage Africa's commitment that the recipient of the report will:

- Take the report seriously and make an initial presumption that the report is valid.
- Be respectful to the reportee, provide reassurance and safeguard their confidentiality and security.
- Agree the best means of communication with the reportee to preserve confidentiality.
- Reiterate that Advantage Africa will not instigate reprisals of any type due to the disclosure of malpractice.

The reportee has the right to request that they are accompanied by another person of their choosing during any meetings or interviews in connection with the allegation.

If reports are made anonymously, Advantage Africa will take these seriously, and as far as possible follow the same investigative procedures. However, if information is limited it may be more difficult to make effective enquires and direct feedback to the complainant will not be possible.

The reportee will not be expected to prove the truth of any allegations; however they should be able to provide useful information to establish that there are reasonable grounds for the allegation. Useful information may include:

- Is anyone at immediate risk of harm?
- What happened? (dates, times, places)
- Who is involved?
- How do they know about it?
- When were they first concerned about it?
- Who have they told about it?

The report recipient will make a written record of the details of the allegations, and provide the reportee with a written acknowledgement. They will take copies of any documents or materials provided by the reportee.

It is likely that the report recipient will wish to discuss the issue with another appropriate member of staff or a trustee (e.g. the Safeguarding Lead, Chair of Trustees or Treasurer). This policy allows for the limited sharing of sensitive information on a 'need to know basis' and where it is necessary to strengthen any enquiries.

If the allegation discloses evidence of a criminal offence, it will immediately be reported to the Board of Trustees and a decision will be made as to whether to inform the Police.

Once Advantage Africa's investigations into the malpractice allegations are concluded, the reportee will be informed of any actions to be taken. If the allegations have been substantiated the offender will be sanctioned in accordance with Advantage Africa's disciplinary policy and procedures. This could result in dismissal or criminal prosecution. Documentation of the whole process from initial report to disciplinary action (if instigated) will be filed in a security protected format.

4. Governance and Accountability

This policy is principally designed to support and encourage exposure of malpractice. If you report a genuine concern, even if it is later discovered that you are mistaken, under this policy **you will not be at risk of losing your job or from suffering any form of reprisals as a result.**

This assurance is not however extended for example to an individual who maliciously raises a matter they know to be untrue.

This policy is made available to all staff, associates and partners and on Advantage Africa's website. It is freely provided on request, for example to donors and operational partners.

Review

The policy will be reviewed and relevance checked by staff and signed off by trustees as necessary, always in the case of a serious incident and at least once a year.

Current Director, Advantage Africa – Andrew Betts

Current Chair of Trustees – Mandy Smith

Current Treasurer Trustee – Christopher Chapman

Current Staff Safeguarding Officer – Rob Aley, Programme Manager, Advantage Africa

Current Safeguarding Trustee Lead – Pratima Dattani

Other Associated Advantage Africa Policies & Procedures

Disciplinary and Grievance Procedures

Safeguarding Policy

Guidelines for Visitors to Projects

Trustees' Code of Conduct

Trustees' Risk Register