

# Whistleblowing Policy

## 1. Purpose

Whistleblowing is when someone who works in or for an organisation passes on information that they reasonably believe shows wrongdoing by that organisation. It is important that individuals feel safe and listened to when raising concerns. From the organisation's point of view, it gives a good opportunity to stop poor practice at an early stage before it becomes normalised and serious incidents take place.

## 2. Policy

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with. This policy will be reviewed annually.

## 3. Background

It is important that any fraud, misconduct, or wrongdoing by staff or others working on behalf of the organisation is reported and properly dealt with. We therefore strongly encourage all individuals to raise concerns that they may have about the conduct of others in the organisation or the way in which the organisation is run.

Examples of such wrongdoing could include:

- A criminal offence
- A miscarriage of justice
- Financial malpractice, corruption or fraud
- An act creating risk to health and safety
- An act causing damage to the environment
- A breach of any other legal obligation
- Improper or unethical behaviour by LHR representatives
- Conduct likely to damage LHR's reputation
- Concealment of any of the above

It is not necessary for you to have proof that such an act is being, has been, or is likely to be committed – a reasonable belief is sufficient. You have no responsibility for investigating the matter – it is the organisation's responsibility to ensure that an investigation takes place. If you make a protected disclosure you have the right not to be dismissed, subjected to any other detriment or victimised because you have made a disclosure. We encourage you to raise your concerns under this procedure in the first instance.

## **4. Principles**

- Terms of the LHR Code of Conduct and other internal governance policies should be followed by all members at all times.
- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of the organisation should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- No employee or other person working on behalf of the organisation will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.
- Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.
- If a complaint concerns a specific person, the accused will also have the right to information, anonymity during the investigation, and a right to appeal.
- If misconduct is discovered as a result of any investigation under this procedure, our disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a coordinator, you should not agree to remain silent.
- Concerns regarding behaviours by members outside of LHR (e.g. by those in partner organisations) should also be reported through the procedure described below. These concerns will then be evaluated and escalated through proper avenues (internal or external) by LHR's Safeguarding Officer.

## 5. Procedure

### a. Stage 1

In the first instance, any concerns should be raised with the LHR Safeguarding Officer via the Incident Report Form or directly via the email addresses provided below. They will then arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. You may submit a concern anonymously (via the Incident Report Form), but please note that this could hinder the investigation procedure, and that no information regarding the outcome will be provided to you. Any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account and you may be asked to comment on any additional evidence obtained. The Safeguarding Officer will take any necessary action, including reporting the matter to the Chairperson of LHR Board of trustees and any appropriate government department or regulatory agency if applicable, to ensure that suitable action is taken. At the conclusion of any investigation, you will be told the outcome and what the organisation has done or proposes to do about it. If no action is to be taken, the reason for this will be explained.

**LHR Safeguarding Officer -** [safeguarding@lighthouserelief.org](mailto:safeguarding@lighthouserelief.org)

**[LHR Incident Report Form](#)**

### b. Stage 2

If you are concerned that the LHR Safeguarding Officer is involved in wrongdoing, have failed to make a proper investigation, or have failed to report the outcome of the investigation to the relevant person, you should escalate the matter to the Chairperson or/and Vice Chairperson of LHR Board of trustees. The board member(s) will arrange for a review of the investigation to be carried out, make any necessary inquiries and make their own report to the board. The board member(s) will also take any necessary action, reporting the matter to any appropriate government department or regulatory agency if applicable. The board member(s) will also invoke any disciplinary action required in cooperation with the coordination team on the ground. At the conclusion of the review, you will be told the outcome and what the organisation has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

**LHR Board Members – Contact List**

Sara Granath - [sara.granath@lighthouserelief.org](mailto:sara.granath@lighthouserelief.org)

Jim McAuliffe - [jim.mcauliffe@lighthouserelief.org](mailto:jim.mcauliffe@lighthouserelief.org)

### **c. Stage 3**

If at the conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. This could include:

In Sweden:

- Police: <http://www.polisen.se/>
- Swedish Tax Agency (Skatteverket) [www.skatteverket.se](http://www.skatteverket.se)
- LHR's internal auditor: Erik Agerup, [erik.agerup@arevision.se](mailto:erik.agerup@arevision.se)

In Greece:

- Hellenic Police: <http://www.astynomia.gr/>

## **6. Other Policies**

- [LHR Code of Conduct](#)
- [LHR Safeguarding Policy](#)
- [LHR Privacy Policy](#)

## **7. Location and Access to the Policy**

This document is located on Google Drive [here](#).

Responsible for the Policy is the Safeguarding Officer

email: [safeguarding@lighthouserelief.org](mailto:safeguarding@lighthouserelief.org)

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Adopted on: Dec. 2020

Reviewed date: Feb. 2022