VISION ACTION – WHISTLEBLOWING POLICY

CO-CEO foreword

At Vision Action, we are committed to maintaining the highest standards of integrity, transparency and accountability. Creating a culture where people feel safe to speak up is essential to that commitment.

This policy ensures that anyone connected with Vision Action can raise concerns about wrongdoing confidently, knowing they will be treated fairly and protected from retaliation. By speaking up, individuals help us safeguard our colleagues, beneficiaries, and the reputation of the organisation.

Thank you for your commitment to upholding these standards.

Tiwonge Mwase-Vuma — **Co-CEO**

Jale Canlibalik — **Co-CEO**

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1. Purpose and Scope

This policy sets out Vision Action's commitment to a safe, transparent, and accountable speaking-up culture. We are committed to the highest standards of integrity, openness, and ethical conduct, and to ensuring that concerns about wrongdoing can be raised without fear of retaliation.

The policy provides a mechanism for staff, trustees, volunteers, partners, consultants, contractors, and beneficiaries to raise concerns in the public interest. Vision Action has a zero-tolerance approach to retaliation against any person who raises a genuine concern or assists with an investigation.

Concerns may include (but are not limited to): safeguarding risks, fraud, corruption, harassment, Sexual Exploitation and Abuse (SEA/SEAH), discrimination, breaches of legal or regulatory requirements, or misuse of charitable funds. All concerns will be taken seriously and addressed promptly.

This policy supports compliance with UK whistleblowing legislation, including the Public Interest Disclosure Act (PIDA), Charity Commission reporting requirements, and the Economic Crime and Corporate Transparency Act 2023. It also reflects Vision Action's commitment to strong governance across its international programmes.

This policy applies to all individuals connected with Vision Action, including employees, trustees, volunteers, consultants, contractors, partners, agents, and beneficiaries, whether in the UK or internationally. Concerns raised by beneficiaries or partners will be handled with the same level of protection and seriousness as those raised by staff.

2. Definitions and Examples of Reportable Concerns

Reportable concerns include, but are not limited to:

- Safeguarding violations or failures to protect children or adults at risk
- Discrimination, harassment or victimisation based on protected characteristics (including race, gender, disability, sexual orientation, age, religion or belief, pregnancy/maternity, marriage/civil partnership, gender reassignment), or any breach of Vision Action's Equality, Diversity & Inclusion commitments.
- SEA/SEAH incidents or concerns
- Fraud, theft, embezzlement or financial misconduct/malpractice or impropriety
- Bribery or corruption
- Misuse or diversion of charitable funds
- Conflicts of interest not declared
- Failure to comply with legal or regulatory obligations
- Improper conduct or unethical behaviour
- Protection from harm (medical and other)
- Health and safety breaches
- A miscarriage of justice

- Acts intended to conceal wrongdoing
- Criminal offences or unethical conduct by any representative of Vision Action

Whistleblowing and Grievances

Whistleblowing is distinct from raising a personal grievance. Personal grievances relate to an individual's own employment or working conditions and should normally be raised through the appropriate grievance procedure. Whistleblowing concerns relate to wrongdoing that affects others, the organisation, or the public interest.

- Whistleblowing concerns relate to wrongdoing that affects others or is in the public interest.
- Grievances relate to personal employment matters such as individual working conditions or employment disputes.
- Where a concern includes elements of both, Vision Action will decide which procedure is most appropriate and may use more than one process where necessary.

3. Safeguards and Protection

Vision Action is committed to protecting anyone who raises a genuine concern. Retaliation, victimisation, harassment, discrimination, or any other detrimental treatment against a whistleblower is strictly prohibited and may result in disciplinary action.

Disclosures should be made:

- in good faith;
- with a reasonable belief that the information tends to show wrongdoing or a reportable concern; and
- to an appropriate person under this policy.

Vision Action will handle all disclosures sensitively and confidentially. The identity of the individual raising the concern will be protected wherever possible. However, confidentiality cannot be guaranteed where disclosure is necessary to conduct a fair investigation, protect individuals from harm, comply with legal obligations, or support regulatory or criminal proceedings.

Anonymous concerns may be considered where sufficient information is provided and the concern appears credible, although investigations can be more difficult where the whistleblower's identity is unknown.

Individuals who raise concerns honestly and in good faith will not be subject to disciplinary action if the concern is not subsequently substantiated. However, knowingly false, malicious, or vexatious allegations may result in disciplinary action and, in serious cases, legal consequences.

Under UK whistleblowing legislation, certain disclosures may qualify for statutory protection, including disclosures relating to sexual harassment where the individual reasonably believes the disclosure is made in the public interest. While statutory protections apply to workers as defined by law, Vision Action extends the principles of protection in this policy to volunteers, trustees, partners, contractors, consultants, and beneficiaries.

4. How to Raise a Concern (Speaking Up)

Vision Action encourages individuals to speak up as soon as they become aware of a concern, no matter how small it may seem. Concerns may be raised verbally or in writing with:

- A line manager
- Country Director (for international concerns)
- Co-CEOs Tiwonge.Mwase-Vuma@visionaction.org.uk or Jale.Canlibalik@visionaction.org.uk
- Chair of Trustees Ian.kerr@visionaction.org.uk

Individuals who are not employed by, or working on behalf of (volunteer, consultant) or in partnership with Vision Action can raise a concern to either of the Co-CEOs or Chair of Trustees.

Concerns may also be raised externally with Protect or the Charity Commission where appropriate.

Anonymous Allegations - this policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the charity. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations - In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

5. Investigation Process

Upon receipt of a concern, Vision Action will assess, investigate and respond promptly and fairly. Investigations will be conducted impartially, confidentially and in accordance with the procedure set out in Section 6.

Vision Action will acknowledge receipt of concerns promptly and, where appropriate, normally within 3 working days.

Timeframes may be extended or accelerated where necessary depending on the nature of the concern, legal requirements, safeguarding considerations, or operational constraints. Vision Action will keep the whistleblower informed of any significant changes to expected timescales.

6. Investigating Procedure

Once an initial assessment confirms that an investigation is required, the appointed investigating officer will follow the steps below. The timeframes are indicative and may be adjusted where complexity, international factors, or safeguarding considerations require, but Vision Action will keep the whistleblower updated throughout.

1. **Obtain full details and clarify the concern**
    a. Timeframe: Within 5–7 working days of acknowledgement
    b. Conduct an initial assessment
    c. Appoint an independent investigator within 5 working days of completing the initial assessment. The investigating officer will gather initial information, understand the nature and scope of the concern, and identify whether immediate action or external reporting is required.
2. **Inform the individual(s) subject to the allegation**
    a. Timeframe: As soon as appropriate within the first 10 working days
    b. The individual(s) named in the disclosure will be informed unless doing so would:
        i. create a safeguarding risk,
        ii. compromise evidence, or
        iii. interfere with criminal, regulatory, or SEA/SEAH procedures.

They will be advised of their right to be accompanied by a trade union representative or colleague during any interview. In exceptional cases, a legal representative may be permitted.

3. **Consider external bodies and mandatory reporting**
    a. Timeframe: During days 1–10 of the investigation window
    b. The investigating officer will assess whether the matter must be referred to:
        i. Police,
        ii. Local safeguarding authorities,
        iii. Specialist SEA/SEAH responders,
        iv. Auditors (for financial issues), or
        v. the Charity Commission, if a Serious Incident Report may be required.

A Co-CEO or Chair of Trustees will be consulted as appropriate.

4. **Conduct a full and impartial investigation**
    a. Timeframe: Typically completed within 20–30 working days
    b. Gather evidence and interview relevant parties within 20–30 working days, depending on complexity and location. The investigation may include:
        i. interviewing staff, partners, or beneficiaries,
        ii. reviewing documents and communications,
        iii. obtaining written statements,
        iv. working with international offices or partners where relevant.

All interviews and evidence will be recorded.

5. **Produce a written investigation report**
    a. Timeframe: Within 10 working days of completing evidence gathering
    b. Conclude the investigation, determine actions and write a report within 10 working days of evidence collection.
    c. The report will summarise:
        i. the concern raised,
        ii. investigative steps taken,

iii. evidence gathered,
iv. findings, and
v. recommendations.

d. Submit report to one or both Co-CEOs and/or Chair of Trustees depending on the nature of the concern

6. **Decision-making and actions**
   a. Timeframe: Within 10 working days of receiving the report
   b. Leadership will determine appropriate action, which may include:
      i. disciplinary action,
      ii. safeguarding measures,
      iii. partner sanctions or contract termination,
      iv. policy or procedural changes,
      v. submission of a Serious Incident Report to the Charity Commission.
7. **Provide feedback to the whistleblower**
   a. Timeframe: Within 5 working days of case closure
   b. Feedback will confirm whether the concern was upheld and that appropriate action has been taken. Confidential details will not be shared.
8. **Learning and organisational improvement**
   a. Timeframe: Within one month of case closure
   b. Investigation outcomes will be reviewed to identify learning points and improve organisational policies, training, or controls.
9. **If the whistleblower is not satisfied**

If the whistleblower believes their concern has not been handled appropriately, they may escalate it internally (to either Co-CEO or Chair of Trustees) or externally to:

- The Charity Commission, or
- Protect (the UK whistleblowing charity).

7. Serious Incident Reporting (Trustees)

Trustees have a legal duty to report serious incidents to the Charity Commission when they result in significant harm, risk to beneficiaries, financial loss, reputational damage, or criminal activity. Staff must escalate concerns that may trigger an SIR to Co-CEOs or the Board immediately.

Serious safeguarding concerns, including allegations of abuse, exploitation, neglect or SEA/SEAH, will be managed in accordance with Vision Action's Safeguarding Policy and any applicable statutory reporting requirements. Such concerns may require immediate action and accelerated reporting and investigation procedures.

8. External Reporting Options

Individuals are encouraged to raise concerns internally wherever appropriate. However, this is not required where there is a reasonable belief that evidence may be concealed, retaliation may occur, or the concern involves senior leadership or trustees.

If internal reporting is not appropriate, individuals may contact:

- Charity Commission (whistleblowing@charitycommission.gov.uk)
- Protect (the UK whistleblowing charity) for confidential advice
- Police, where criminal activity is suspected

9. Record Keeping and Confidentiality

All whistleblowing reports and investigations will be documented securely and retained in accordance with data protection legislation. Information will only be shared on a need-to-know basis and in line with safeguarding or legal reporting requirements.

10. Monitoring and Review

Whistleblowing trends and themes will be reviewed regularly to assess organisational culture and identify areas for improvement. Lessons learned from whistleblowing cases will inform organisational improvements.

Monitoring, Assurance and Key Performance Indicators

Vision Action monitors the effectiveness of this policy through regular review and key performance indicators.

The following **KPIs** will be monitored and reported to senior management and Trustees:

- % of staff, trustees, and volunteers receiving whistleblowing awareness (target: 100%)
- Number of whistleblowing concerns raised (by type and location)
- % of concerns acknowledged within required timeframe (target: 100%)
- Time taken to complete investigations
- Number of concerns raised through anonymous or alternative reporting routes
- Number of serious incidents escalated to Trustees / Charity Commission

ANNEX A: COMPLIANCE TO WHISTLEBLOWING POLICY

I have received and been briefed on the Vision Action Whistleblowing Policy and fully understand my responsibilities to comply with and promote the Policy.

Signed	
Name	
Position within Vision Action	
Date	