



Subject	Whistle Blowing Policy		
Responsibility	Head of Human Resources	Date	Sept 2021
Sponsor	Chief Executive	Page	Page 1 of 4

1 Introduction

Farm Africa’s mission is to promote sustainable agricultural practices, strengthen markets and protect the environment in rural Africa. It is vital that these aims are delivered through integrity, which means being honest and transparent in what we do and say, and accepting responsibility for our individual and collective actions.

Farm Africa is an organisation that acts with integrity, honesty and openness. It is expected that those working for, and representing Farm Africa will do the same.

To enable Farm Africa’s staff and other stakeholders to have confidence in our integrity, honesty and openness; this policy aims to provide a supportive process that encourages and enables employees or workers to raise concerns about malpractice within Farm Africa without repercussion and will give them confidence that their concerns will be properly investigated and resolved in a timely manner.

For clarity, ‘whistleblowing’ typically occurs when an individual raises a specific concern regarding a work related malpractice regarding fraud or other illegal, improper or unethical conduct which may affect the organisation, the other employees or other stakeholders. Normally, issues of malpractice may not necessarily affect the complainant directly, thus are quite different from normal grievances and complaints.

This policy has the following objectives:

- To provide direction to all Farm Africa workers on what is unacceptable practice within Farm Africa, and to provide a safe and secure environment to blow the whistle on unacceptable practice
- To make workers aware of their rights and responsibilities with regard to upholding the values and standards of practice of Farm Africa and how to raise concerns when these are not upheld
- To protect workers who raise a concern in good faith and who have a reasonable suspicion that the alleged malpractice has occurred, is occurring, or is likely to occur
- To provide reassurance to those workers who raise concerns in good faith and with reasonable suspicion that they will not experience any repercussions for doing so.

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Where an employee has a concern about their terms and conditions of work, their working relationship with Farm Africa, or how a concern they raised was addressed, they are encouraged to use Farm Africa's grievance procedure.

In the event that an employee feels they are being bullied or harassed in the workplace for any other reason they are encouraged to refer to the Bullying and Harassment Policy.

An employee who makes a whistleblowing disclosure in good faith and in accordance with this policy will be protected in line with the provisions of this policy.

2 Scope of the policy

This policy applies to all employees, contractors/consultants and agency workers, trustees, interns, volunteers or those on work-placement working on behalf of Farm Africa. Throughout the document, the term "worker" will apply to collectively define these groups.

Whilst this is not an exhaustive list, malpractice would include the following:

- A criminal offence, including theft, fraud or corruption
- A failure to comply with a legal obligation, (including but not limited to financial regulations)
- Cases where justice is not adhered to
- Accepting gifts outside of the parameters set in the bribery, corruption and fraud policy, which are intended to influence decision making
- The endangering of an individual's health and safety, and well-being: this would include towards staff member, worker or visitor to Farm Africa
- A breach of Farm Africa's code of conduct, safeguarding or child protection policies
- Damage to the environment or conduct which conflicts with Farm Africa's interests
- Deliberate disregard or serious breach of Farm Africa's policies or values, including bullying and harassment, and discrimination
- Deliberate concealment of information to cover any of the above

The whistle blower must:

- a) Make the disclosure in good faith, meaning, with honest intent and without malice
- b) Reasonably believe that the information he has is substantially true and involves malpractice
- c) Reasonably believe they are making the disclosure to the right person

3 Principles

Any concern raised in accordance with these procedures will be treated seriously and investigated thoroughly and in a timely manner by Farm Africa.

All efforts will be made to keep the identity of the individual disclosing their concerns confidential. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required if this is essential to the investigation.

The individual raising the concern using this policy will not be expected to take part in any further investigations relating to the concern, unless the person investigating has further questions to ask them or requires them to make a statement as part of the evidence. Whilst they will be informed whether and if any action is being taken as a result, they do not have a right to information about what action will be taken, due to the confidential nature and circumstances of these cases.

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Farm Africa encourages individuals to make a report where they have genuine concerns. If an individual makes an allegation in good faith, which is then not confirmed by subsequent investigation, no action will be taken against that individual. If Farm Africa finds that an individual has made a malicious allegation, then disciplinary action may be taken against that individual.

4 Making a disclosure

In the event that they suspect malpractice, workers at Farm Africa have a responsibility to inform someone who is able to do something about the problem. This will normally be someone in the Directors' team, or using the confidential reporting email address as outlined in the "Reporting Fraud and Corruption" leaflet.

The concern should be supported with evidence, however, it is not expected that the person raising a concern under this policy will need to undertake an investigation to get this evidence. This should only be the information the worker has that has made it evident to him that a malpractice is taking place. It is Farm Africa's responsibility to ensure that a proper investigation is undertaken.

Allegations may be made anonymously, however, it is important to note that these kind of disclosures are less credible and may be harder to investigate. Thus workers are especially encouraged to come forward with disclosures to give validity to the information they wish to disclose and ease the investigation process.

The decision on whether to investigate any anonymous allegations will be based upon:

- The seriousness of the issue raised
- The credibility of the concern
- The likelihood of confirming the allegations from attributable sources

5 Action following disclosure

Where a concern has been raised, the person receiving the disclosure, or another appropriate senior member of staff will hold a meeting with the worker who has made the disclosure in order to get all the details. She/he will then ensure that a comprehensive investigation is carried out by an appropriate member of staff.

The member of staff against whom the complaint has been made will be informed as soon as possible and may be suspended whilst further investigations are carried out. This and all other subsequent procedures will be in accordance with the Farm Africa Disciplinary policy and procedures.

Any person found to have victimised a person who raises a concern within the scope of this policy or tries to deter them from doing so, will be considered to have committed an act of gross misconduct and will be subject to a disciplinary process.

Failure to observe this policy - either by disclosing information inappropriately or by not reporting evident malpractice will be dealt with in line with the Farm Africa Disciplinary policy.

6 Responsibilities

The Chief Executive is accountable for ensuring the effective implementation of this policy throughout Farm Africa and representing Farm Africa's interests/concerns in the event of publicity or litigation resulting from a whistle-blowing allegation.

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Line managers (anyone who manages a member of staff) are responsible for ensuring that the principles of this policy are communicated and understood throughout their teams. They are also responsible for putting the policy into practice. These responsibilities include:

- Ensuring that all concerns raised by workers are taken seriously
- Ensuring that concerns are investigated properly, objectively and in a timely manner
- Ensuring that the worker is kept informed of progress
- Ensuring that action is taken to resolve the concern.

The HR Department is responsible for providing coaching, advice and guidance to line managers on the implementation and use of the policy.

7 Procedure and timing for the review of this policy

This policy will be reviewed as a minimum every three years. Comments or suggestions on how this policy is operating should be sent to the Head of Human Resources.