

1. Purpose

This policy intends to:

- Protect those reporting concerns from any retaliation or reprisal
- Reduce any fear of repercussions to those raising concerns
- Provide confidence that concerns will be properly addressed and resolved at the right level and as quickly and effectively as possible
- Offer an alternative or parallel route for raising concerns if the normal channels do not seem to address the concern, or have not been responded to appropriately when it relates to a sufficiently serious matter
- Provide mechanisms to escalate concerns if it does not fit within any other TLM policy

2. Definitions

Whistleblowing = Act of disclosing information about a concern of wrongdoing in the work place.

Whistle-blower = The individual making a disclosure or speaking out about the concern.

Disclosure = Raising a concern about actual or suspected wrongdoing which can include malpractice, illegal or dangerous practices, misconduct or harm that can affect not only yourself but also others. This can relate to the past, the present or the future. We will refer to this generally as a concern. Concerns can include, but are not limited to, the following:

- Criminal offence (including theft, fraud or corruption)
- Illegal, dishonest, dangerous, or fraudulent practices
- Sexual harassment, exploitation or abuse
- Bullying or harassment
- Breach of a legal obligation
- Miscarriage of justice
- Endangering an individual's health and safety and well-being
- Damage to the environment
- Deliberate concealment of information relating to any of the above

3. Scope

This policy applies to all TLM entities (Members, Affiliates, TLM International and The Leprosy Mission Shop). All TLM entities are expected to:

- Adopt the minimum standards of this Policy and Procedures
- Contextualise it when necessary

This policy applies to all TLM employees, Board members, volunteers and interns. Other individuals performing functions in relation to TLM, such as consultants, contractors, casual workers, agency workers and partner staff are encouraged to use it.

4. TLM's commitments

TLM will:

- **Provide a supportive environment and process** that enables you to raise concerns within TLM without fear of repercussions and gives you confidence that your concerns will be properly investigated and resolved in a timely manner.
- **Protect individuals who raise a genuine concern**, even if it turns out to be mistaken. Individuals who raise concerns in good faith must not suffer any detrimental treatment because of raising their genuine concerns. Any attempt to victimise an individual for having raised a concern, or to deter anyone from raising such a concern, is a serious disciplinary offence.
- **Respect any legitimate concerns about your own safety or career**, and will seek not to disclose your identity without your express consent.

5. Raising Whistleblowing Concerns

5.1 How to raise concerns internally

Proof is not needed to raise a concern. To raise a concern there only needs to be reasonable belief that a concern has occurred, is occurring, or is likely to occur. If you decide to raise a concern, you will be asked to explain as fully as you can the information or circumstances that leads to your concern.

As soon as you have a concern, **you should raise it in line with the relevant TLM policy**, depending on the nature of the concern.

In the first instance if your concern is about:

- Misuse of funds - use the [Fraud prevention policy](#)
- Bribery or financial crime - use the [Bribery and corruption policy](#) or [Anti-Money Laundering and Counter-Terrorist Financing Policy and Guidelines](#)
- Sexual harassment, exploitation or abuse - the [Safeguarding Policy](#)
- Bullying and Harassment - use the [Bullying and Harassment policy](#)
- Complaint about employment - use the [Grievance policy or Guidance](#)
- Privacy and Data Protection- use the [Privacy and Data Protection Policy](#)
- Employee relations- use the [Grievance policy or Guidance](#) or the [Bullying and Harassment policy](#)

(The links above are to the TLM global policies. Members are encouraged to change the links to their local policies)

All these policies can be obtained from line managers or HR Leads and or HR Focal points and they will indicate the right channel of reporting and what happens next.

(Members are encouraged to refer to where their local policies can be found, for example in the Staff Handbook)

When a concern relates to a disclosure (as defined in section 1), or no other policy covers the concern, or you feel other processes under the relevant policy have not progressed in addressing the issue, or you are unable for other reasons to raise it through the normal channels, you can report to:

National Level	Country Leader:
	Board Chair:
Global Level	whistleblowing@leprosymission.org

5.2 How to raise concerns through an outsourced Whistleblowing Hotline

TLM uses an effective external whistleblowing service that can be used by any individual in addressing wrongdoing in the workplace. Concerns can be raised using this link:

<https://www.safecall.co.uk/en/file-a-report/>.

5.3 How to raise a concern externally

Although we always encourage you to report concerns internally first, there may be exceptional circumstances when you feel it is appropriate for you to report your concern to an external body such as a regulator. TLM recommends that you seek professional advice from an official body or external agency with experience in the particular area of concern before reporting the concern externally. This particularly applies to any approach to the media due to the impact that this channel may have to you personally and the organisation.

5.4 Confidentiality

TLM aims to create an environment where staff and representatives feel able to voice suspected concerns openly.

TLM recognises the importance of keeping your identity protected if you have decided to raise a concern. TLM will always seek your consent before disclosing your identity to others at any stage of the process.

TLM will take seriously all concerns raised, even those raised anonymously. However, proper investigation may be more difficult or even impossible without having direct contact with the individual who initially raised the concern.

It is the responsibility of TLM Boards, Country Leaders and Management staff to promote an environment where staff and representatives feel safe and confident to raise concerns openly, without fear of reprisals or negative consequences.

If you report a suspected concern, or are aware of such a report, then you must also maintain confidentiality by not sharing the concern inappropriately to persons who may not have any ability or authority to help. Failure to do so could make it impossible for the concern to be investigated effectively and could cause further risk.

6. TLM's response to concerns

You can generally expect the following process to concerns raised, although not all concerns raised might require the same level of response:

- a) TLM will acknowledge your concern and arrange a meeting with you as soon as possible normally within 2 weeks to discuss your concern. You may bring a TLM colleague or union representative as a support person with you to any meeting if you wish. Any support person must respect the confidentiality of your disclosure and any subsequent investigation.

- b) Once a concern has been received, it will firstly be assessed to determine the policy(ies) that relate to it and the appropriate steps to take. When other policies and procedures apply, these will be followed and you will be informed of the relevant policies that cover your concern. This will guide the appropriate course of action, which may involve an initial inquiry and a formal investigation.
- c) Under no circumstances should you investigate your concerns yourself, interview anyone or do anything that may alert the alleged wrongdoer, or destroy or interfere with any evidence (unless it is necessary in circumstances of harm or an immediate risk of harm. The safety of everyone concerned is paramount).
- d) A written summary of your concern will be made and you will be provided with a copy of it after the meeting. TLM will also aim to give you an indication of how we propose to deal with the matter.
- e) Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our initial assessment in writing. You may be required to attend additional meetings in order to provide further information.
- f) If appropriate, a suitable person will be identified to manage the investigation. They will not have any previous involvement with the concern, or have any conflict of interest in respect of the matter. This will be someone who is in a position to take any necessary action, which may result from the investigation.
- g) In some cases, we may appoint an investigator or team of investigators, including staff with relevant experience of investigations or specialist knowledge of the subject matter.
- h) Where appropriate, we may have to notify external authorities as early as possible in the investigation process.
- i) Anyone called upon to assist with an investigation will have a duty to cooperate and may request that their comments be treated in confidence. Such wishes will be respected where possible.
- j) The investigation report will be reviewed and acted upon by the person managing the concern. All documentation relating to a whistleblowing case will be stored securely and kept confidential to those that need to know only and for the period of time that is appropriate according to the case. This person managing the concern will ensure that any actions proposed are followed through. They will also review and act on organisational learning from the issues raised. If applicable, they will also inform relevant internal stakeholders and / or external bodies.
- k) While TLM cannot guarantee that it will respond to your concern in the way that you might wish, TLM will try to handle the matter fairly and properly and in line with the appropriate policy(ies).
- l) If after raising a concern you are unhappy with the outcome, or with the way your concern is handled, TLM will generally ask you to submit a written report explaining why this is the case. When there is a good reason for the matter to be reassessed, this will be taken forward in line with the appropriate policy(ies)

7. Whistle-blower Protection

7.1 Retaliation prohibited and punished

Any threats or attempts to retaliate against those raising concerns are absolutely prohibited. TLM will protect all whistle-blowers from any form of reprisal.

Examples of retaliation may include, but are not limited to:

- Discriminatory treatment
- Blame
- Victimisation
- Unsubstantiated negative performance appraisals/feedback that do not reflect actual performance
- Unjustified contractual changes: dismissal, reductions in (or deductions of) wages, suspension, demotion, loss of promotion opportunities, reassignment, or transfer
- Unjustified modification of duties
- Harassment, intimidation, or bullying
- Threats to the person, their family and/or property

Retaliation towards someone who has reported a concern in good faith constitutes a breach of this policy and may amount to gross misconduct. TLM may initiate disciplinary proceedings towards those who retaliate. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

7.2 Interim protective measures

Individuals who report a concern in good faith, or cooperate with a duly authorised audit or investigation, as is their duty, are protected under this policy.

If information is received that the person who raised the concern or anyone else involved may be at risk of retaliation or has suffered retaliation, this must be immediately reported according to this policy so that interim protective measures can be provided while the claim of retaliation is assessed.

Interim protective measures for the person at risk or experiencing retaliation can include:

- Temporary reassignment
- Transfer to another office or function for which the person is qualified
- Placement on special leave with full pay
- Any other appropriate action on a case-by-case basis, including security measures or temporary suspension or removal of the person who may have retaliated

7.3 Permanent protective measures

If it is established, based on the conclusions of the formal assessment, that the person who raised the concern has been retaliated against, TLM's leadership will select an appropriate permanent protective measure. Such measures may include, but are not limited to:

- The termination of the retaliatory action
- Reassignment to another office or function for which the person is qualified
- Disciplinary action, reassignment or suspension of the retaliator

8. Fair treatment of the subject of a concern or other people implicated.

If you raise a concern against another person or collective group in bad faith (that is, you knew it to be false and is raised in malice), then disciplinary action will be taken against you. If TLM's disciplinary process does not apply (for example, in the case of a consultant), steps may instead be taken to terminate the relationship with TLM.

Fair treatment of all is very important to TLM. This includes the person or group of individuals referred to in a concern. The reputation of a person or a group needs to be protected. Due process will bring any concern to the appropriate outcome and when or if there are repercussions, TLM will treat all with respect and the appropriate consideration.

Although immediate preventive action may be required at times towards the subject(s) of a concern until the outcome is clear, TLM will be mindful of the following principles to enable fair treatment:

- **Risk Assessment** - will be made to ensure that potential risk to all parties are taken in consideration and proper mitigation measures are in place.
- **Confidentiality** - Concerns will be handled confidentially to protect the reputation of anyone involved.
- **Assessment** - Any concern raised will be first assessed to determine if there is good faith and if there are sufficient grounds to bring the concern to a formal investigation stage
- **Transparency** - The subject of concern and any person implicated in the concern will be appropriately informed of the process and given the opportunity to provide their account and or any evidence.
- **Rights** - The principle of the presumption of innocence throughout the response and, when appropriate, the investigation process will prevail.
- **Respect** - In all instances, everyone involved in a Whistleblowing concern will be treated with respect.

9. Review and Revision

The International Office (Head of People and Safeguarding, and Head of Quality Assurance), in conjunction with the Global Fellowship Board, should review this policy from a legal and operational perspective at least once every three years, and when an incident or event highlights the opportunity for improvement of practices and/or in response to developments in law, regulation and best practice.

Related documents:

[Safety and Security Policy and Procedures](#)

[Strategic Human Resources Framework](#)

[Safeguarding Policy](#)

[Safeguarding Procedures](#)

[Bullying and Harassment Policy](#)

[Disciplinary guidance](#)

[Whistleblowing Policy](#)

[Fraud prevention policy](#)

[Bribery and corruption policy](#)

[Anti-Money Laundering and Counter-Terrorist Financing Policy and Guidelines](#)

[Grievance Guidance](#)

[Privacy and Data Protection Policy](#)

Document History

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