Whistleblowing Policy

Purpose

Refugee Support Europe (RSE) is committed to maintaining the highest standards of integrity, accountability, and ethical conduct across all its operations. This policy supports that commitment by providing a clear, confidential, and safe mechanism for individuals to raise concerns about suspected wrongdoing or misconduct, in line with good governance and responsible management of funds and operations.

This policy should be read alongside other relevant organisational policies, including Safeguarding and Code of Conduct

Scope

This policy applies across all operational contexts and locations. It applies to all individuals engaged with RSE, including:

- Employees
- Volunteers
- Trustees
- Contractors, consultants and partners
- Any individuals acting on behalf of the organisation

Definitions

Whistleblowing is the disclosure of information by staff, trustees or volunteers which relates to some danger, fraud or other illegal or unethical conduct in the workplace. The Employment Rights Act 1996, as amended by the Public Interest Disclosure Act 1998, governs the making of such disclosures and is intended to protect individuals from detriment or unfair treatment as a result of raising concerns in good faith. Types of concerns:

- Conduct which is an offence or a breach of law, including but not limited to corruption, fraud or bribery
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- The unauthorised use of public funds or other financial irregularities
- Sexual or physical abuse
- Other unethical conduct
- Concealment of any of the above

Detrimental Conduct means any action (or threat of action) taken against a person because they have raised a concern, including dismissal, harassment, discrimination, reputational harm or any form of retaliation.

This policy does not cover routine workplace grievances, which should be addressed through appropriate complaints processes.

Policy Statement
Refugee Support Europe encourages a trusting and supportive environment where concerns can be raised without fear of reprisal. All concerns will be taken seriously and, where appropriate, investigated thoroughly, promptly and confidentially. Individuals raising concerns in good faith will not be subject to detriment as a result of doing so.

How to Raise a Concern
Concerns can be reported to:

- Centre Coordinator
- CEO
- A Trustee (particularly where concerns involve senior staff)

Concerns should normally be raised through appropriate organisational channels, including safeguarding procedures, complaints processes, or line management. Where individuals feel these routes are not appropriate – including where the Designated Safeguarding Officer (DSO), deputy, or relevant personnel are implicated – concerns should be raised via the whistleblowing process.

In such cases, concerns should be submitted via email to the Chair of Trustees at andy.tasker@refugeesupporteu.com, with **'Whistleblowing'** clearly stated in the subject line. Reports should include:

- Your full name and project/department
- The date the concern is raised
- A summary of the concern
- Details of any witnesses or supporting evidence
- Details of any steps taken to resolve the matter informally

Where individuals feel unable to raise concerns internally, they may escalate to an appropriate external authority.

Confidentiality and Anonymity
All reasonable steps will be taken to protect the identity of individuals raising concerns. Disclosures may be made anonymously, and will be assessed on their merits. However, anonymity may limit the ability to fully investigate the concern. Information will only be shared where necessary to investigate the issue, comply with legal obligations, or prevent serious harm.

Protection from Retaliation
Refugee Support Europe prohibits any form of retaliation against individuals who raise concerns in good faith. Any person found to have engaged in detrimental conduct may be subject to disciplinary action, up to and including termination of their engagement. This protection extends to individuals supporting or participating in an investigation.

Investigation Process

- All concerns will be acknowledged promptly
- An initial assessment will determine the appropriate response
- Where required, a fair and impartial investigation will be conducted
- Appropriate action will be taken based on findings
- Where possible, the individual raising the concern will be informed of the outcome, while maintaining confidentiality

False or Malicious Allegations

Concerns raised in good faith will not result in negative consequences, even if unsubstantiated. However, knowingly making false or malicious allegations may result in disciplinary action.

Governance and Oversight

Overall responsibility for this policy sits with the CEO and Trustees. Serious concerns, particularly those relating to financial misconduct, safeguarding or senior leadership, will be escalated to Trustee level where appropriate.

Review of Policy

This policy will be reviewed every 2 years to ensure it remains effective, relevant, and aligned with legal and regulatory expectations.