

# Malaria Consortium

## Whistle Blowing Policy



Last updated: February 2018  
Author: Jocelyn Boughton, Chief Finance Officer  
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## 1. Purpose and context

The aim of the Malaria Consortium Whistle Blowing Policy is to provide a mechanism for anyone to report any suspicious, unethical, abusive or corrupt activities, including sexual misconduct, that breach the code of conduct. The policy sets out the process and principles for reporting concerns relating to issues in behaviour to enable alleged misconduct to be investigated whilst protecting employees who report reasonably held suspicions.

## 2. Principles

Any person working with Malaria Consortium has a duty to report any other activity that is a risk to the security or safety of staff, volunteers and beneficiaries and holds staff guilty for not reporting. Individuals who whistle blow will not be penalised for any whistle blowing if reported in good faith.

Provided they have acted in good faith and are not themselves implicated in the issue, no Malaria Consortium employee, partner, contractor or beneficiary reporting suspected breaches shall:

- be dismissed or threatened to be dismissed
- be disciplined or suspended or threatened to be disciplined or suspended
- be penalised or any other retribution imposed, or
- be intimidated or coerced

Violation of the whistle blowing policy by itself will result in disciplinary action that may end in dismissal. If an allegation is made in good faith, but it is not confirmed by the investigation no action will be taken against the originator, however, action may be considered against individuals knowingly making false malicious allegations. Separate consideration will be given to individuals who themselves are involved in the suspicious activity but choose to whistle-blow the concerns.

## 3. Scope

Staff and volunteers must immediately report any suspicion of fraud, dishonesty or sexual misconduct resulting in a breach of the code of conduct or Malaria Consortium's other policies and procedures to their line manager. Failure to report any suspected breach will be treated as a serious issue and may result in disciplinary measures being taken. The line manager must immediately report the suspicions to the Internal Audit Manager via [concern@malariaconsortium.org](mailto:concern@malariaconsortium.org).

If the matter relates to a confidential HR matter, then this is to be reported directly to the HR Director ([e.boonmansalgado@malariaconsortium.org](mailto:e.boonmansalgado@malariaconsortium.org)).

If the member of staff or volunteer is unable to report to their line manager for any reason, they can contact the Internal Audit Manager or the HR Director directly or can email to [concern@malariaconsortium.org](mailto:concern@malariaconsortium.org). Other individuals (non-Malaria Consortium employees) who are notified of this policy, are also to report any suspicions to [concern@malariaconsortium.org](mailto:concern@malariaconsortium.org).

Malaria Consortium hopes that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concerns confidentially, Malaria Consortium aims to keep your identity secret.

## 4. Implementation

Once a suspected breach is reported, immediate action is required to prevent the theft, alteration, or destruction of relevant records. Such actions include removing the records and placing them in a secure location, limiting access to the location where the records currently exist and preventing the individual suspected of committing a breach from having access to the records.

The Internal Audit Manager and HR Director where applicable will establish whether there are clear grounds for initiating an independent investigation. If this is established, then a formal investigation must take place using an independent third party, for example a manager not associated with the individuals involved or an independent professional firm. Fraud investigations will be based on the Organisation's Guidelines for Fraud Investigations.

Irrespective of to whom the incident is originally reported, all incidences must be reported to the Internal Audit Manager at the earliest opportunity so they can monitor that the incident is being appropriately managed and addressed. A central register of all incidences is held by the Internal Audit Manager to help identify improvements needed in Malaria Consortium's controls. Unless it may cause a conflict of interest, the development of all formal investigations will be reported to the relevant Regional Director, Regional Finance Manager if it relates to financial issues and the Chief Finance Officer. Any investigation that highlights an infringement of corruption, fraud and the Code of Conduct is reported to the Chief Executive, who will report the act to the Board of Trustees.

If any suspicious incident involves either the Internal Audit Manager or HR Director and therefore cannot be reported to these individuals then reporting must be direct to the Chief Executive ([c.nelson@malariaconsortium.org](mailto:c.nelson@malariaconsortium.org)). If the matter concerns the Chief Executive the matter can be reported to the Chair of the Board.

All participants in an investigation shall keep the details and results of the investigation confidential. However, as noted above, from time to time other members of the management team will need to be consulted in conjunction with the investigation.

Serious incidences are required to be reported to the Charity Commission, the independent regulator of charities in England and Wales. Any serious incident that has resulted or could result in a significant loss of funds or a significant risk to property, work, beneficiaries or reputation will be reported immediately, not just on completion of the Annual Return. Serious incidences are:

- fraud, theft or the charity losing a significant amount of money another way
- a large donation from an unknown source
- links with terrorism
- suspicions, allegations and incidents of abuse or mistreatment of vulnerable beneficiaries

We will also report an incident where:

- the incident is reported to the police or other statutory agencies (unless it is a technical or minor issue that poses little or no risk)
- Malaria Consortium, or individuals associated with Malaria Consortium and in connection with their role within it, are the subject of a police or other statutory agency investigation
- the trustees decide that the incident presents a serious or significant risk to the charity, its beneficiaries, reputation or assets
- the internal risk assessment of the incident concludes that the charity should act to avoid a serious or significant risk to the charity, its beneficiaries, reputation, services or assets or professional advisers advise us to notify the Charity Commission of the incident.

**Malaria Consortium**

Development House 56-64 Leonard Street  
London EC2A 4LT, United Kingdom

[www.malariaconsortium.org](http://www.malariaconsortium.org)  
[info@malariaconsortium.org](mailto:info@malariaconsortium.org)

UK Registered Charity No: 1099776  
US EIN: 98-0627052

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