

Whistleblowing Policy

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Introduction

The WeProtect Global Alliance (WPGA) is committed to maintaining the highest standards of integrity, transparency, and accountability in all its activities. As an international organisation working to prevent and respond to technology-facilitated child sexual exploitation and abuse, upholding ethical conduct and lawful practice is essential to achieving our mission and maintaining public confidence.

This Whistleblowing Policy provides a safe and confidential mechanism for anyone representing WPGA, members, suppliers or members of the public to raise concerns about suspected WPGA related wrongdoing, malpractice, or risks that could harm individuals, the organisation, or the wider public. WPGA encourages a culture of openness in which staff feel confident to speak up if they believe that something is not right. Raising concerns at an early stage allows potential problems to be addressed promptly and appropriately.

WPGA is committed to ensuring that individuals who raise genuine concerns in good faith are treated fairly and are protected from victimisation or retaliation. All disclosures made under this policy will be taken seriously and handled with sensitivity, confidentiality, and due consideration for the individuals involved.

This policy is intended to comply with the provisions of the UK Public Interest Disclosure Act 1998, which protects workers who raise genuine concerns about wrongdoing in the workplace. The policy will be published on the WPGA website to ensure public accessibility.

Scope

This policy applies to all individuals representing the WeProtect Global Alliance including employees, Board members, contractors, consultants, interns, volunteers, and temporary staff. It also applies to individuals engaged through partner organisations or third parties where concerns relate to WPGA's activities.

The policy covers concerns about wrongdoing, risk, or malpractice that affect others or the integrity of WPGA's work. This may include, but is not limited to:

- Criminal activity, such as fraud or money laundering
- Failure to comply with legal or regulatory obligations
- Miscarriages of justice
- Unsafe or dangerous health and safety practices
- Environmental damage
- The deliberate concealment of any of the above matters.

This policy is intended to address concerns that are in the public interest and relate to organisational conduct or practices (see Code of Conduct Policy). It is not designed to address personal employment complaints or issues relating solely to an individual's own circumstances at work. Such matters should be raised by an employee through the organisation's Grievance Policy and Procedure.

Where there is uncertainty about whether a concern falls within the scope of this policy, individuals are encouraged to seek advice from an appropriate senior contact before making a disclosure (see Appendix A).

Definition of Whistleblowing

Whistleblowing is the act of raising a concern about suspected wrongdoing, risk, or malpractice that may harm individuals, the organisation, or the wider public interest. A concern may relate to actions that are illegal, unethical, unsafe, or inconsistent with the organisation's policies or values.

A whistleblower is any individual who reports such a concern in good faith. This may include employees, contractors, consultants, volunteers, interns, partners, suppliers, or other stakeholders connected with the organisation's activities.

Concerns that may be raised through whistleblowing include, but are not limited to:

- Criminal activity, such as fraud or money laundering
- Failure to comply with legal or regulatory obligations
- A miscarriage of justice
- Unsafe or dangerous health and safety practices
- Environmental damage
- Abuse of authority or serious breaches of organisational policies
- Attempts to conceal any of the above.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In such cases, employees should refer to the Grievance Policy and Procedure.

If you are uncertain whether something is within the scope of this policy, you should seek advice from the Director of Operations and Finance or Executive Director.

Raising a whistleblowing concern

We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing. They may be able to agree on a way of resolving your concern quickly and effectively.

However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

- Director of Operations and Finance
- Executive Director
- Chair of the Policy Board

Contact details are set out at the end of this policy in Appendix A.

We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague from the WPGA team to any meetings under this policy. This companion must respect the confidentiality of your disclosure and any subsequent investigation. No one is obliged to agree to act as a companion.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

Confidentiality

We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every reasonable effort to keep your identity suitably confidential. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

We do not encourage staff to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. We may not be able to take the claim further if you have not provided all the information needed.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should contact the Director of Operations and Finance, Executive Director or Chair of the Policy Board, as appropriate, and appropriate measures can then be taken.

If you are in any doubt, you can seek advice from our confidential counselling Employee Assistance Programme (employees only) or Protect, the independent whistleblowing charity, who offer a confidential helpline. Contact details are at the end of this policy.

Investigation and outcome

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 assessment. You may be required to attend additional meetings in order to provide further information.

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. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

While we cannot guarantee the outcome you are seeking, we will always aim to deal with your concern fairly and appropriately.

If you are not satisfied with the way in which your concern has been handled, you can raise it with one of the other key contacts set out in the Contacts in Appendix A.

External Disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. In some cases, it may be necessary to report an issue to an external entity to ensure compliance with regulatory standards.

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. The independent whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.

It will very rarely, if ever, be appropriate to approach the media. If you report your concern to the media, in most cases you will lose your whistleblowing law rights.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a supplier, service provider or stakeholder. In some circumstances, the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first. You should contact your line manager or one of the contacts set out in the Contacts table in Appendix A.

Protection from Victimisation

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, support a colleague to raise a concern or act as a witness

- Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Director of Operations and Finance, Executive Director or Chair of the WPGA Board, as appropriate immediately. If the matter is not remedied, you should raise it formally using our Grievance Policy and Procedure.
- The Employee Assistance Programme that offers mental and emotional support is available for confidential support to whistleblowers who raise concerns under this policy. See contact details below.

Any form of retaliation or victimisation will be treated seriously and may itself be a disciplinary matter.

Review

Version No.	Approved by	Owner	Approved by date	Date last updated	Review date	Review frequency	Next review date
1.1	Director of Operations and Finance	Deputy Head of Operations and Finance	April 2026	n/a	n/a	Every two years	April 2028

Appendix A – Whistleblowing Contacts

This section is included in the full version which is available to internal employees and volunteers at WPGA.