

1. Why this Whistleblowing Policy & Process exists

The JAM UK trustees and leadership team, in alignment to JAM International, is intentional about high levels of integrity, transparency, ethical conduct and meaningful impact to our beneficiaries.

JAM UK's policy for whistleblowing is to ensure facilitation, investigation and remediation of a genuine concern about JAM UK or its implementation partners. In lieu of this, several whistleblowing channels are available and formally overseen by relevant stakeholders.

The JAM UK leadership team want all stakeholders to be confident that they are free of victimization or discrimination for making use of whistleblowing. Please do not ignore or avoid your concern if it can be reported in good faith to stop or prevent unacceptable behaviours and situations that negatively affect JAM UK objectives or its reputation. If your life or someone else's life is in danger, please contact the Police and seek safety.

This policy aims to provide:

- **clarity** about the process, contacts and considerations for whistleblowing;
- **confidence** that whistleblowers will be protected and each report will be given due consideration and treated with confidentiality;
- **accountability** that ensures fair process and concrete action;
- **transparency** to all stakeholders, including staff, volunteers and donors

2. Examples of issues that might require whistleblowing

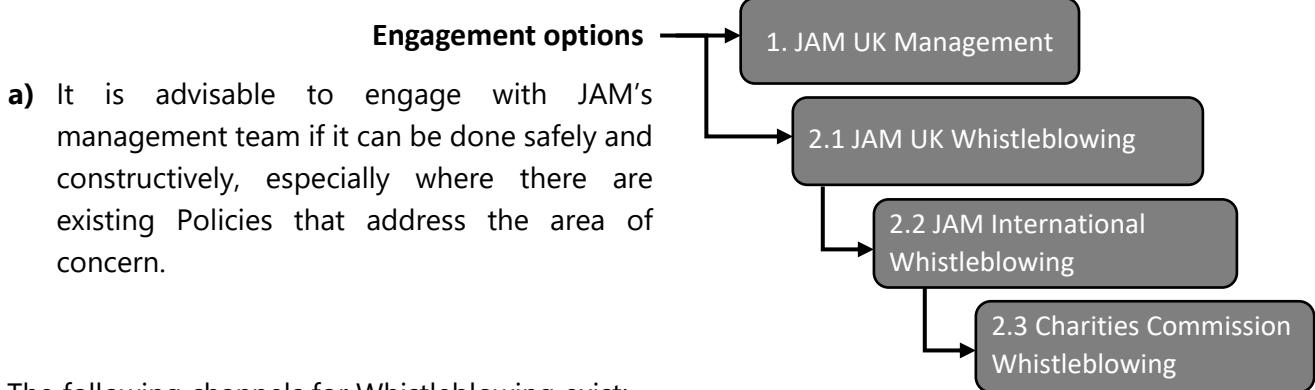
- Abuse of vulnerable people
- Breaking of the law or regulations
- Health, safety and environmental risks
- Misappropriation of assets or funds
- Sexual harassment or discrimination
- Theft & Fraud (incl. money laundering, corruption)
- Unethical behaviour and misconduct

3. Who can report and incident?

The Whistleblowing channels are open to beneficiaries, staff, suppliers, volunteers, partners, donors, and any other stakeholder that engages with JAM UK or its implementation countries.

Please make sure you have applied a **process of determination before** deciding to report an issue (refer Annexure A).

4. How do you report an issue?



The following channels for Whistleblowing exist:

- b) JAM UK Whistleblowing** which is overseen by the Safeguarding Lead and appointed by the Board with the responsibility of ensuring that ethics and safeguarding are effectively adhered to. The JAM International Whistleblowing channel is also notified of any JAM UK Whistleblowing reports.

E-mail: SayJAMUK@jamint.com

- c) JAM international Whistle Blowing** which is overseen by the Global CFO of JAM International.

E-mail: Say@jamint.com

- d) The UK Charities Commission**

E-mail: whistleblowing@charitycommission.gov.uk

The UK Public Interest Disclosure Act on anonymity can be found [here](#). The UK Charity Commission Privacy notice on how your details will be protected and managed can be found [here](#).

5. What information should you include in your report?

- Name and contact information (e-mail, phone) – anonymous reports are a last resort.
- Consent if you are comfortable for your name & contact information to be disclosed to Trustees or investigators that might require further clarity or context;
- In which country the issue exists (UK or implementation/program country)
- What your concern is, in including as much detail as possible to enable meaningful action e.g. names / dates / places / amounts;
- The impact of the issue, for example, harm to people, financial loss, poor health & safety, misappropriation of assets or negative reputational effect;
- Attach any evidence that you might have;

- Indicate what action you have taken with regard to the matter e.g. management engagement.

6. What process is followed for Whistleblowing?

Note: Your privacy will be safeguarded and confidentiality maintained throughout the process.

1. The Whistleblower **report** is submitted, after it was given consideration (refer Annexure A) and containing the detail requested (refer Item 5).

2. The recipient of the reported information will make contact with you to **acknowledge** your report within 5 days, and to clarify or confirm information

3. **Investigation** could follow various options, such as:

- a. Internal investigation will follow, to ascertain the details of the issue and best course of action;
- b. Independent internal investigation by Internal Audit or Finance & Oversight function;
- c. Independent external investigation by forensics firm or external auditors;
- d. Report to the Police might be necessary, depending on physical safety and criminal elements;
- e. Investigation by the Charities Commission;

4. **Actions** from the investigation process could result in various outcomes, for example,

- a. No action being taken;
- b. Training or communication across the organisation;
- c. Changes to process, people or systems; and/or
- d. Legal action.

An internal record of whistleblowing reporting will be maintained for tracking trends and making sure that lessons are learnt and sustainable changes are implemented.

5. **Feedback** will be provided to the Whistleblower once the conclusion of the investigation(s) has been reached. Due to the sensitivity of whistleblowing, and making sure that whistleblowers and affected people are protected, feedback will not include detail that is not in the public domain.



Annexure A: Process of consideration to determine a credible Whistleblowing case:

- Is my perspective free from assumptions or personal bias?
- Do you have sufficient detail to report so that you can enable a quick and well-directed investigation?
- Is there someone in the management, human resources or finance & oversight function I can consult that is capable and willing to assist in dealing with the issue in a constructive manner?
- Is this issue existing, in the past or going to happen in the future? (This might influence the type of action taken and urgency of action)
- Is my concern and intended solution aimed at the greater good and sustainability of the organisation, or an individual? Make sure that the consequences of reporting the issues are well considered.
- If I have a grievance with my line manager, have I consulted the Human resources team at JAM GSO about the relevant policy and process?
- If my physical safety, or the safety of another person is at risk, can I contact the Police or a security service to intervene immediately?
- Are one of the following present:
 - Health & Safety concerns for employees, volunteers or other stakeholders
 - Criminal offences such as theft, fraud, bribery and money laundering
 - Damage to the environment or community resources (e.g. water pollution)
 - Disregard for the values and Code of Conduct that JAM aspires to
 - Intentional failure to disclose material information
 - Discrimination, harassment (including sexual harassment) or bullying
 - Deliberate failure to adhere to humanitarian principles, laws or regulations