

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



We achieve our purpose through a business minded approach in line with our **CORE VALUES**

DELIVERY | EFFICIENCY | LEADERSHIP | TRUST | ALIGNMENT

If you **SEE SOMETHING** that doesn't live up to our values, **SAY SOMETHING!**

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 or security services and seek safety.*

## JAM's Whistle Blowing policy aims to provide

- **clarity** about the process, contacts and considerations for whistleblowing
- **confidence** that whistle blowers 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

## Examples of issues that might require whistleblowing

- Abuse of vulnerable people, such as children, women and elderly
- Breaking of the law or regulations
- Health, safety and environmental risks
- Misappropriation of assets or funds
- Sexual exploitation, harassment or discrimination
- Theft and Fraud (incl. money laundering, terrorism financing, corruption)
- Unethical behaviour and misconduct

## Who can report an incident?

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

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

## How to report an issue

It is advisable to engage with JAM's management team if it can be done safely and constructively, especially where there are existing Policies that address the area of concern.

The following channels for Whistleblowing exist:

1. **JAM UK Whistleblowing** which is overseen by the Safeguarding Lead and Managing Director. The Safeguarding lead is appointed by the Board of Trustees with the responsibility of ensuring that ethics and safeguarding are effectively adhered to. The JAM Int. CFO or mandated person is also notified of any JAM UK Whistleblowing reports. E-mail: [Say\\_JAM\\_UK@jamint.com](mailto:Say_JAM_UK@jamint.com)
2. **JAM International Whistleblowing** which is overseen by the CFO of JAM International. E-mail: [Say@jamint.com](mailto:Say@jamint.com)
3. **Deloitte** provides a secure, anonymous reporting channel for criminal or unethical behaviour in the organisation. Operates up to 24 hours a day, 7 days a week, and 365 days a year.



Whistleblowers can choose to be completely anonymous or make their identity known.

We do encourage partially anonymous and confidential disclosures as such disclosures will assist the investigators in better investigating your report.

There are 3 options to choose from in protecting your identity:

**Anonymous:** If you selected to be anonymous you don't need to supply your name or any information that might reveal your identity. Nobody will ever know that you provided us with this information. Unfortunately, this means that we cannot contact you for more information if we need to.

**Partially anonymous:** If you selected to be partially anonymous, then your personal details will be known to only the Deloitte Tip-offs Anonymous contact centre that manages this reporting facility. At no time are these details divulged to the organisation / company where you are employed or to the individual(s) whom you are reporting. If needed, the Deloitte Tip-offs Anonymous contact centre will contact you to obtain further information.

**Confidential:** If you agree to the confidential disclosure of your personal details, then your name and contact details will be known to the Deloitte Tip-offs Anonymous contact centre, the organisation / company you have reported and the investigators that will conduct the investigation.

Email: [JAM@tip-offs.com](mailto:JAM@tip-offs.com) or [0808 189 1196](tel:08081891196) or any of the phone numbers listed below. Calls made from a mobile may be charged.

Country	Number	Limitations	Language Provision
Angola	+244941022880	Generic toll-free number registered with Unitel. Accessible from Unitel, Movitel and all other fixed lines at normal national rates within Angola	English 24/7 or Portuguese Mondays to Fridays 08h00 to 17h00 CAT
Australia	1 800 633 293	Generic toll-freenumber.  Toll-free access from fixed line, accessible from most mobile networks, airtime maybe charged.	English 24/7
Germany	0800-181-2227	Generic toll-freenumber.  Toll-free access from fixed line, accessible from most mobile networks, airtime maybe charged	English 24/7 or German Mondays to Fridays 09h00 to 17h00 CAT
Mozambique	800 112 233 / 800 333 312	Generic toll-free numbers registered with TDM for fixed line, and Vodacom respectively. Toll-free access per number from the specific network only	English 24/7  Portuguese Mondays to Fridays 08h00 to 17h00 CAT
Sierra Leone	+27 31 571 5589	International SouthAfrican number. International call rates from Sierra Leone to South Africa apply	English 24/7
South Africa	0800 203 621	One unique FreeCall number – toll-free access from all networks - exclusivelyfor JAM	English 24/7 or 10 official languages of South Africa Mondays to Fridays 08h00 to 17h00 CAT
South Sudan	+ 27 31 571 5265	International SouthAfrican number. International call rates from South Sudan to South Africa apply	English 24/7 or Arabic Mondays to Fridays 08h00 to 15h00 CAT
Switzerland	0800-838-404	Generic toll-freenumber.  Toll-free access from fixed line, accessible from most mobile networks, airtime maybe charged	English 24/7 or French/German Mondays to Fridays 09h00 to 17h00 CAT

#### 4. The UK Charities Commission



**CHARITY COMMISSION**  
FOR ENGLAND AND WALES

Find out what sort of wrongdoing you can report to the Charity Commission, and how to report it [HERE](#)

#### Get independent advice

If you need advice about blowing the whistle on a charity call Protect's free and confidential advice line:

Telephone: 020 3117 2520

Protect, a specialist whistleblowing charity, can help explain:

- what types of wrongdoing you can report
- your legal rights
- next steps if you decide to report something

E-mail: [whistleblowing@charitycommission.gov.uk](mailto:whistleblowing@charitycommission.gov.uk)

### What information you should think to include in your report?

- Name and contact information (e-mail, phone). We do encourage partially anonymous and confidential disclosures as such disclosures will assist the investigators in better investigating your report.
- Indicate what action you have taken with regard to the matter. Have you followed your charity's complaints procedure or raised it with the management team or the charity's trustees? What was the response? If you have not raised it with your charity, please explain why not.
- What your concern is, in including as much detail as possible to enable meaningful action e.g. names / dates / places / amounts?
- What impact does it have on the people the charity helps, services, staff or reputation, harm to people, financial loss, poor health & safety, misappropriation of assets or negative reputational effect?
- In which country the issue exists, the UK or an implementation/program country?
- Have you contacted other organisations, like the Action Fraud, Charity Commission, police or HMRC? Include reference numbers, the name of who dealt with it, and their response if you have.
- If you attach evidence to your email, how is it relevant to your concern?
- Consent if you are comfortable for your name & contact information to be disclosed to Trustees or investigators that might require further clarity or context.

### What process is followed for Whistleblowing?

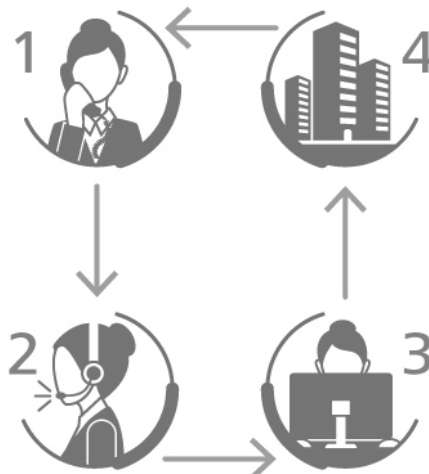
**Note:** You can report anonymously to Deloitte and your privacy will be safeguarded and confidentiality maintained throughout the process. The Whistleblower report is submitted, after it was given consideration (see below the process of consideration below) and containing the detail requested (see above what should be included in the report).

#### The whistleblower

**Step 1:** The whistleblower contacts the ethics line via a toll free number, e-mail, our website, SMS, free-fax, or free-post

#### Deloitte Ethics Consultant

**Step 2:** A Deloitte Ethics Consultant will liaise with the whistleblower and obtain as much information as possible.



#### Your company's ethics

**Step 4:** The whistleblower contacts the ethics line in order to receive feedback with regards to the report made.

#### Deloitte Report Analyst

**Step 3:** A Report Analyst sanitizes the whistleblower's report, and remove any information from the report that may identify the whistleblower.

**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

**Action(s)** 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
- d. Legal or disciplinary action

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

**Feedback** will be available/provided to the whistle-blower once the conclusion of the investigation(s) has been reached. Due to the sensitivity of whistleblowing, and making sure that whistle-blowers and affected stakeholders are protected, feedback will not include detail that is not in the public domain.

#### **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