



## Whistleblowing Policy

### 1. Introduction

Sabre Education Limited (Sabre) is a leading early years education charity working in Ghana to improve the futures of poor and marginalised children. Our organisational values include integrity and respect. We operate to the highest standards of ethics, transparency, and accountability to earn and sustain the high levels of trust placed in us. We respect views, opinions, cultures and traditions of all our team members, partners, stakeholders and suppliers in each country and region in which we work.

### 2. Purpose

In order for our partners and stakeholders to have confidence in our integrity and respect, this policy aims to provide a supportive process that encourages and enables people to raise concerns about misconduct within Sabre Education at an early stage without repercussion and will give them confidence that their concerns will be properly investigated and resolved in a timely manner.

### 3. Scope

This Whistleblowing Policy is intended to cover disclosures of wrongdoing that are made in the public interest and applies to anyone in contact with Sabre: employees, contractors, partners, volunteers, and the wider public.

This Whistleblowing Policy is part of a multi-layered and integrated approach to addressing concerns at Sabre, the other elements of which are:

- Safeguarding Policy – this policy provides clarity on how anyone who works for or on behalf of Sabre should engage with children, young people and adults at risk through their work with Sabre.
- Complaints Procedures – this procedure identifies how Sabre will respond to general complaints raised by those not directly employed by Sabre.
- Grievance Procedure – this procedure forms part of our staff handbook and identifies how employees can raise complaints in relation to their conditions of employment or working environment.

### 4. Legislation

**UK: The Public Interest Disclosure Act 1998** - *The Act protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing.*

**Ghana: Whistleblower Act, 2006 (Act 720)** - *enacted to empower people to expose corrupt practices and wrongdoing.*

## 5. Definitions

**Whistleblowing** - Whistleblowing is the term used when you pass on information concerning wrongdoing. In this policy, we call that “making a **disclosure**”. The wrongdoing you disclose must be in the public interest. This means it must affect others, for example the general public.

## 6. Guidance for Employees of Sabre Education

### 6.1. Protection

We appreciate that those reporting concerns may be apprehensive. We want to reassure you that you will suffer no detrimental treatment as a result of voicing your concerns.

We will not tolerate victimisation, harassment, bullying or any other detrimental treatment of any worker who has made a disclosure under this policy. Complaints about such behaviour will be dealt with under the Disciplinary Procedure. Should you feel you have been subjected to any detrimental treatment as a result of raising a concern under this policy you should notify the **Executive Director, Ghana**, Tony Dogbe, [Tony.dogbe@sabre.education](mailto:Tony.dogbe@sabre.education) +233501502243

### Disclosures under this Policy

You can make a disclosure under this policy if you have genuine concerns relating to any of the following areas of malpractice, or suspected malpractice. The malpractice can be past, present or likely to happen in the future:

- Criminal activity
- Miscarriages of justice
- Practices endangering people’s health and safety
- Practices damaging the environment
- The charity is breaking the law, for example does not have the right insurance
- Bribery
- Financial malpractice, impropriety or fraud
- Any form of abuse against a child, young person or vulnerable adult\*
- You believe someone is covering up any of the above

\* please also see the Sabre Education Safeguarding Policy for detailed guidance.

Concerns should be raised as early as possible, as this will make it easier to take action and enable any problems to be resolved quickly. However, it is recognised that some bad practices can develop over a long period of time, delaying the opportunity for disclosure, or could be discovered after they have become well-established. There is no definite time limit on raising concerns. Whether an issue can viably be dealt with after a long period of time will depend on the circumstances.

**Please note: No action will be taken against you if you raise genuine concerns even if the concern you raised is not confirmed by any subsequent investigation.**

You are not expected to prove beyond doubt the truth of an allegation, but you will need to demonstrate that there are reasonable grounds for concern.

### 6.2. Confidentiality and Anonymity

Any disclosure you make under this policy will be treated as far as reasonably practicable in a confidential and sensitive manner. If confidentiality is not reasonably practicable, for instance, because of the nature of the information, this will be explained to you.

We hope you will feel comfortable to voice any concerns openly, however, you may make a disclosure anonymously. Concerns expressed anonymously cannot be dealt with as effectively as open disclosures as they are often more difficult to investigate.

### 6.3. How to make a disclosure

- In the first instance you should bring the matter to the attention of the Executive Director, who will inform the Chief Executive Officer.
- If your disclosure contains allegations which you do not wish to make to the Executive Director, or if you cannot reach the Executive Director, you can make the disclosure directly to the Chief Executive Officer.
- If your disclosure contains allegations which you do not wish to make to the Chief Executive Officer, or if you cannot reach the Chief Executive Officer, you can make the disclosure to the Chair of Trustees.

If your disclosure concerns a very serious allegation the Board of Trustees will be notified.

#### Contact Details:

**Executive Director, Ghana**, Tony Dogbe  
Tony.dogbe@sabre.education  
+233501502243

**Chief Executive Officer**, Susan Place Everhart  
Flat 1A, 30 Hyde Park Square, London, W2 2NW  
Susan.placeeverhart@sabre.education  
+44 7443677256

**Chair of Trustees**, David Main  
3 Vicarage Crescent, London Sw11 3LP  
[dpmain@gmail.com](mailto:dpmain@gmail.com)  
+447968028746

### 6.4. Reporting direct to the Media

Employees have a duty to Sabre **not** to disclose confidential information.

Any employee approaching the media without first approaching an appropriate manager within Sabre Education would need to be able to demonstrate that:

- a) they had good reason to conclude that such action was necessary and appropriate,  
and
- b) the organisation had failed to make adequate provision to address the concerns which led them to feel that such a course of action was necessary.

Therefore, any employee contemplating making a disclosure to the media is advised to first seek further specialist guidance from professional or other representative bodies and to discuss matters further with his or her colleagues and, where appropriate, line and professional managers

## 7. What happens next?

### 7.1. Investigation

Once a concern has been raised, we will investigate this. If you have not raised a concern anonymously, you will be asked to attend a meeting as part of this investigation. Comprehensive records of the investigation and disclosure will be kept throughout and stored safely on completion.

We will keep you informed about the progress of the investigation, as far as is possible and appropriate bearing in mind, in particular, any confidentiality obligations that apply. Please note that you will not be given details of any disciplinary action taken unless we consider this appropriate.

## **7.2. Dissatisfaction with the outcome of the process**

If you are dissatisfied with the outcome of the investigation, you should raise this with the person you raised the concern to in the first place, giving the reasons for your dissatisfaction. He/She will respond in writing notifying you of their acceptance or rejection of the need for further investigation and the reasons for this.

Further advice from an independent agency for concerns raised in Ghana can be found here through the **Ghana Anti-Corruption Coalition**: <http://www.gaccgh.org/> and more details read here - [http://www.gaccgh.org/publications/A\\_Guide\\_to\\_Whistleblowing\\_in\\_Ghana.pdf](http://www.gaccgh.org/publications/A_Guide_to_Whistleblowing_in_Ghana.pdf)

Further advice from an independent agency for concerns raised in the UK can be found here through **Protect**: <https://www.pcaw.org.uk/advice-line/>

You can also raise concerns directly with the Charity Commission here <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

## **7.3. Training**

All of our employees will receive an appropriate briefing to ensure that they are fully aware of their rights and responsibilities under this policy. This policy will be made available to all employees as part of their induction.

All managers will be fully briefed as to their role in supporting this policy and the appropriate action to take in the event of any disclosure being made to them.

## **7.4. Breach of this Policy**

We may invoke the Disciplinary Procedure if an employee is found to have subjected a whistleblower to any form of detrimental treatment. It may also be invoked if an employee has intentionally misled us in respect of any matter, breached this policy in any other way and/or if we believe that they have made a false allegation maliciously.

## **7.5. Malicious and Vexatious Concerns**

Protection under the Whistleblowing Policy does not extend to those who act in bad faith or raise malicious, vexatious or knowingly untrue concerns. Sabre Education will ensure that the necessary resources are applied to investigating any complaints received. As a consequence of this it will view seriously any knowingly false, malicious or vexatious allegations which it receives, and will regard the making of any deliberately malicious or vexatious allegations by any employee as a serious disciplinary offence.

## **8. Guidance for those who are not employed by Sabre Education**

### **8.1. Disclosures under this Policy**

If something is troubling you, which you think we should know about, or look into, please use this policy. Don't ignore the concern. If in doubt – raise it!

Sabre recognises the need to encourage all members of the community with concerns about any aspect of Sabre's work to come forward and voice their concerns. Usually these concerns are easily resolved through Sabres Complaints Procedure. However, when they are about unlawful conduct, financial malpractice or dangers to the public or the environment, such as:

- a criminal offence (e.g. fraud, corruption etc.)
- a miscarriage of justice
- the health or safety has been endangered
- funding is being used in an unauthorised manner;
- the environment has been or is likely to be damaged;
- Sabre's policies and procedures have been or are being breached;
- abuse of a project beneficiary or Sabre employee is taking place;

We want you as a member of the public to feel confident about raising serious concerns. Also to feel reassured that, if you raise any concerns reasonably believing them to be true and in the public interest, your concerns will be taken seriously and you will be protected from harassment or victimisation.

## **8.2. Confidentiality**

Sabre will do its best to protect your identity when you raise a concern and do not want your name to be disclosed (information relating to the investigation will be strictly controlled on a need to know basis). Should you ask us to protect your identity by keeping this confidential, we will not disclose it without your consent or unless we are required to do so by a Tribunal, Court of Law or an Act of Parliament (such as the Freedom of Information Act). If the situation arises where we are not able to resolve the concern without revealing your identity (e.g. a statement by you may be required as part of the evidence) we will discuss with you whether and how we can proceed.

## **8.3. Concerns raised anonymously**

Concerns expressed anonymously will be much more difficult for us to look into or to protect your position or to give you feedback. Concerns raised anonymously are much less powerful and less likely to be effective, but they will of course be considered.

## **8.4. How to raise a concern directly with Sabre Education**

As a first step, you should normally raise concerns with the Executive Director, Tony Dogbe if your concern is raised in Ghana.

If your concern is raised in the UK, please bring it to the attention of the Chief Executive Officer, Susan Place Everhart.

### **Contact Details:**

#### **Executive Director, Ghana, Tony Dogbe**

P.O. Box CT 6700, Cantonments, Ghana  
 Tony.dogbe@sabre.education  
 +233501502243

#### **Chief Executive Officer, Susan Place Everhart**

Flat 1A, 30 Hyde Park Square, London, W2 2NW  
 Susan.placeeverhart@sabre.education  
 +44 7443677256

Concerns are better raised in writing. You are invited to set out the background and history of the concern, giving names, dates and places where possible, and the reason why you are

particularly concerned about the situation. If you do not feel able to put your concern in writing, you can telephone or meet the appropriate officer.

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## 9. Signatures

| Chief Executive Officer   | Chair of Trustees  |
|---|--|
| Name:<br>Susan Place Everhart   | Name:<br>David P. Main   |
| Signature:<br> | Signature:<br> |
| Date:<br>2 June 2021  | Date:<br>6 June 2021   |

**Date of next review: June 2023**