

## **Raising a Concern Procedure**

### **1. Purpose**

The British Red Cross (BRC) welcomes and encourages the raising of concerns (also known as 'whistleblowing' or 'raising a public interest disclosure') regarding any wrongdoing, risk, concerns of slavery or human trafficking, and/ or malpractice within the organisation.

This procedure must be read in conjunction with the Raising a Concern Policy and Raising a Concern Policy: Annex.

### **2. Scope**

This policy applies to all: i) BRC employees, officers, consultants, self-employed contractors, casual workers, agency workers, delegates and interns (our people) based in the UK or overseas; ii) Line Managers; and iii) the Advice and Case Work Team. Staff seconded to the International Committee of the Red Cross (ICRC) or the International Federation of the Red Cross (IFRC) should in the first instance use the equivalent ICRC or IFRC Procedure.

This procedure does not apply to raising complaints relating to personal circumstances and/ or treatment in the workplace and the Grievance Resolution Procedure and/ or Dignity at Work Procedure are applicable in these circumstances.

This procedure does not apply to volunteers. Refer to the Volunteer Complaints, Issues and Concerns Policy and Concerns Policy and Volunteer Complaints, Issues and Concerns Procedure for complaints, issues or concerns either raised by or relating to volunteers.

This procedure does not form part of any contract of employment or other contract to provide services, and we reserve the right to amend contracts at any time.

### **3. Procedure Statement**

The BRC aims to address concerns about wrongdoing or unethical behaviour promptly and fairly. We encourage our people to raise concerns as soon as possible. Retaliation in response to any individual raising a concern will not be tolerated.

#### **3.1. Raising Your Concern**

##### **3.1.1. Our Assurances to You**

**3.1.1.1.** It is understandable that whistle-blowers are sometimes worried about possible repercussions like losing their job or experiencing forms of reprisal as a result.

**3.1.1.2.** We encourage openness and support our people who raise concerns in accordance with this procedure, even if

the concern is deemed to not require investigation and resolution.

**3.1.1.3.** Harassment, victimisation and/ or detrimental treatment of anyone raising a concern at the BRC is not tolerated; the latter includes dismissal, disciplinary action, threats or other unfavourable treatment and must be reported to the Head of People Advisory, the Advice and Casework Team or our External Auditors.

**3.1.1.4.** Such conduct may be subject to disciplinary action (refer to the Disciplinary Policy and Disciplinary Procedure).

### **3.1.2. Who Should You Raise Your Concern With**

**3.1.2.1.** You must raise any concerns with your Line Manager or the Advice and Casework Team, in person or in writing.

**3.1.2.2.** If you feel unable to raise the matter with your Line Manager or the Advice and Casework Team, you must raise the matter with the Head of People Advisory by email.

**3.1.2.3.** If the matter is too serious and you cannot discuss it with those in sections 3.1.2.1. or 3.1.2.2., you may contact (refer to the Raising a Concern Policy and Procedure RedRoom page for details):

- i. Chief Executive Officer.
- ii. Freedom to Speak Up Guardian.
- iii. Non-Executive Freedom to Speak Up Guardian.

**3.1.2.4.** If the Chief Executive Officer, Freedom to Speak Up Guardian or Non-Executive Freedom to Speak Up Guardian deem it appropriate, they may refer the issues raised directly to relevant experts in the organisation.

### **3.1.3. Confidentiality**

**3.1.3.1.** Anyone making a disclosure should feel assured that information will only be shared during the investigation on a 'need to know' basis. However, we recognise there may be situations when you would prefer to speak to someone confidentially first. If this is the case, this must be expressed at the outset.

**3.1.3.2.** If you ask us not to disclose your identity, we must not without your consent unless, required by law.

**3.1.3.3.** There may be times when we are unable to resolve a concern without revealing your identity, e.g. where your

personal evidence is essential. In such cases, we must discuss with you whether, and how, the matter can best proceed.

**3.1.3.4.** If you cannot raise your concern openly or even confidentially, you may raise your concern anonymously. However, concerns raised anonymously are much more difficult to investigate, and if we do not know who you are, we cannot provide feedback or protect you from harassment or detrimental treatment.

**3.1.3.5.** Anonymous concerns must be taken into account only after considering the seriousness of the issue, the credibility of the disclosure, the likelihood of being able to investigate the matter, and fairness to any individual mentioned in the disclosure.

#### **3.1.4. How Your Concern Will be Dealt With**

**3.1.4.1.** When you raise a concern, you must tell us how you would like the matter to be resolved. Depending on the type of concern raised, some concerns may be dealt with informally during everyday business.

**3.1.4.2.** For more serious concerns, we must carry out a proportionate investigation and must reach a conclusion in a reasonable timescale. We aim to act promptly, however, the timescales can vary according to the case. We must keep you informed of progress.

##### **3.1.4.2.1. Meeting**

- i. Depending on how you have raised your concern, a nominated manager must arrange a meeting with you as soon as possible to discuss your concerns.
- ii. You have the right to be accompanied, as set out under section 3.1.5., to any meetings under this procedure. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.
- iii. We must record a written summary of your concern and provide you with a copy after the meeting. We must also give you an indication of how we propose to deal with the matter in a follow-up email.

### **3.1.5. Your Right to Be Accompanied**

#### **3.1.5.1.** You have the right to be accompanied at meetings.

Companions must be either a work colleague (including volunteers), an accredited Trade Union representative, or a Staff Association representative.

#### **3.1.5.2.** If your companion is unavailable to attend a meeting and will not be available for more than seven calendar days after the scheduled time, you may be asked to choose an alternative companion.

#### **3.1.5.3.** Companions must be granted reasonable time off from their normal duties, without loss of pay, to attend meetings. Acting as a companion is voluntary and colleagues are under no obligation to do so.

#### **3.1.5.4.** At the discretion of the Advice and Casework Team, you may be permitted to bring an alternative companion, such as a family member, e.g. if this would provide a disability reasonable adjustment.

#### **3.1.5.5.** Companions must be allowed to address the meeting to put forward and sum up your case, respond on your behalf to any views expressed and confer privately with you during the meeting.

#### **3.1.5.6.** Companions do not have the right to answer questions on your behalf, address the meeting without your permission or prevent either party from explaining their case.

### **3.1.6. Investigation and Outcome**

#### **3.1.6.1.** Once you have raised a concern, we must carry out an initial assessment to determine the scope of any investigation. We must inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information.

#### **3.1.6.2.** 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.

#### **3.1.6.3.** Whenever possible, we must give you feedback on the outcome of any investigation. However, we may not be able to disclose the details about the precise actions we

must take where this would infringe a duty of confidentiality we owe to another person.

**3.1.6.4.** If we conclude that an individual has made false allegations maliciously, the individual may be subject to disciplinary action.

**3.1.7. If You Are Not Satisfied**

**3.1.7.1.** While we cannot always guarantee the outcome you are seeking, we must deal with your concern fairly and in an appropriate way. By being compliant with this procedure, you can help us to achieve this.

**3.1.7.2.** If you are not happy with the way in which your concern has been handled, you must raise it with one of the other key contacts as per section 3.1.2.3. Alternatively, you may contact the Head of People Advisory, the Advice and Casework team or our External Auditors.

**3.1.8. External Disclosures**

**3.1.8.1.** If you feel it may be more appropriate to report your concerns to an external body such as a regulator, we strongly encourage you to seek advice before doing this.

**3.1.8.2.** You can use SafeCall an impartial, external ethics hotline service that helps our people to report their concerns related to their working environment, in a safe and secure manner (refer to RedRoom for further information on SafeCall).

**3.1.8.3.** All reports to Safecall are reviewed by the Head of People Advisory and a decision is made regarding how the concern must be addressed.

**3.2. Lessons Learned from Procedure Evaluation**

The changes made to this procedure directly arise from bringing it into alignment with the Policy and Procedure Framework and through obtaining feedback from key stakeholders (Staff Association, People Support, People Partners, Advice and Casework, International Human Resources, Equity, Diversity and Inclusion Team, Chief of Staff, Talent Growth and the Diversity Networks).

**4. Responsibilities**

The Chief Operating Officer together with the Senior Director of People are responsible for oversight of this procedure.

The Head of People Advisory ensures implementation and compliance with this procedure.

The Owner (Chief Operating Officer) oversees the development or review of the procedure document, and provides support to the Lead (People Policy Advisor).

The Lead undertakes the procedure review under the guidance, and with the support, of the Owner.

The Advice and Case Work Team provide advice and support for the implementation of this procedure.

All our people, Line Managers and the Advice and Case Work Team are responsible for adherence to, and complying with, this procedure.

## 5. Governance

<b>Associated policy document/s</b>	<ul style="list-style-type: none"> <li>• Raising a Concern Policy</li> <li>• Disciplinary Policy</li> <li>• Information Governance Policy</li> <li>• Confidentiality Policy</li> <li>• Data Protection Policy</li> <li>• Dignity at Work Policy</li> </ul>	
<b>Supporting procedure document/s</b>	<ul style="list-style-type: none"> <li>• Disciplinary Procedure</li> <li>• Confidentiality Procedure</li> <li>• Dignity at Work Procedure</li> </ul>	
<b>Procedure/s superseded</b>	N/A	
<b>Legislation/ regulatory requirements and standards</b>	<ul style="list-style-type: none"> <li>• Public Interest and Disclosure Act 1998</li> <li>• Employment Rights Act 1996</li> </ul>	
<b>Endorsing Authority; Endorsement date</b>	Head of People Advisory; 01 2026	
<b>Approval Authority; Approval date</b>	Head of People Advisory; 01 2026	
<b>Procedure Owner</b>	Chief Operating Officer	
<b>Procedure Lead</b>	People Policy Advisor	
<b>Date effective</b>	01 2026	
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<b>Revision history</b>	<b>Version</b>	<b>Summary of change (s)</b>
January 2015	1.0	Original procedure document.

October 2015 – Scheduled major review	2.0	Change title from 'Whistleblowing' to Raising Concerns. Changes to terminology and procedure steps. Included EAP information. Added assurance and confidentiality paragraph. Clarify limitations on feedback and outcomes. Removed reference to Audit Commission.
July 2016 – Interim update	2.1	Added information in relation to slavery and human trafficking - requirements of the Modern Slavery Act; updated on corporate procedure template.
November 2016 – Interim update	2.2	Updated HR job title to P&L Advice and Support.
December 2017 – Interim update	2.3	Updated to align with HR Policy Framework.
February 2018 – Interim update	2.4	Update job title of Head of Risk and Assurance to Head of Internal Audit.
May 2018 – Interim update	2.5	Added information about Safecall.
September 2018 – Interim update	2.6	Removed references to Positive People Company (PPC).
October 2018 (Interim update); November 2018 (Scheduled major review); May 2019 (Scheduled major review)	2.7	Update name of organisation from 'Public Concern at Work' to 'Protect'. Review in Dec 2018 not necessary due to recent updates to the procedure. Review date changed to April 2019 to link in with wider implementation of whistleblowing communications and raising awareness across the organisation. Review date push back in line with 3 year cycle after 2018 reviews to October 2021.
March 2020 – Interim update	2.8	Amended to incorporate the Freedom to Speak Up Guardian role to the procedure.

November 2020 – Interim Update	2.9	Minor changes to the section on the Freedom to Speak Guardian in order to make the process clearer.
May 2021 – Interim update	2.10	Updated contact process for Protect.
June 2021 – Scheduled major review	3.0	Had a review and update in May 2020. Change review date back in line with the 3yr cycle.
October 2022 – Major review	4.0	Outset review.
November 2025 – Interim update	4.1	Removal of references to Protect. Policy and procedure links updated.
January 2026 – Scheduled major review	5.0	Compliance with the Policy and Procedure Framework; non-procedural content moved to a supporting document; replaced Chair of FAC with Head of People Advisory.



## Appendix: Definitions

**Anonymous Reporting:** submitting a concern without revealing your identity.

**Companion:** an individual (a colleague, or accredited Trade Union or Staff Association representative) who will provide support to the employee, ensuring fairness, representation, and adherence to due process.

**Compliance:** adherence to laws, regulations, and internal policies.

**Detrimental Treatment:** any negative action taken against someone for raising a concern, such as dismissal or harassment.

**External Auditor:** an independent specialist who evaluates areas of an organisation to provide objective assurance that information is accurate, processes are reliable, and standards are being met.

**External Disclosure:** reporting a concern to a body outside the organisation, such as a regulator.

**Freedom to Speak Up Guardian:** a senior leader within the organisation who champions speaking up culture at the highest level.

**Guardian:** a designated individual responsible for supporting and promoting safe reporting practices.

**Harassment:** unwanted behaviour that makes someone feel intimidated, humiliated, offended, or unsafe.

**Human Trafficking:** the illegal trade of people for exploitation or commercial gain.

**International Committee of the Red Cross:** a neutral, independent organisation ensuring humanitarian protection and assistance for people affected by armed conflict and other violence.

**International Federation of the Red Cross:** co-ordinates international relief provided by National Societies for victims of natural disasters, and for refugees and displaced persons outside conflict zones.

**Investigation:** a formal process to examine and respond to a raised concern.

**Malicious Allegation:** a false concern raised with intent to harm or mislead.

**Non-Executive Freedom to Speak Up Guardian:** an impartial advisor who supports staff in raising concerns safely and confidentially.

**Reprisal:** punishing someone because they raised a concern, made a complaint, or exercised a right, sometimes called retaliation.

**Safecall:** an external, confidential hotline service for reporting workplace concerns.

**Slavery:** a situation where individuals are exploited and cannot refuse or leave due to threats, violence, or deception.

**Victimisation:** treating someone unfairly because they raised a concern or complaint.

**Whistleblowing:** reporting concerns about wrongdoing or risks within an organisation.