



HR POLICIES & PROCEDURES

CABI

Whistleblowing

February 2021

KNOWLEDGE FOR LIFE



General

CABI improves people's lives worldwide by providing information and applying scientific expertise to solve problems in agriculture and the environment.

This mission is underpinned by a commitment to conduct our business with honesty and integrity and in a professional manner.

1. Introduction

CABI is committed to conducting our business with honesty and integrity, and we expect all staff and anyone acting on our behalf to maintain high standards in accordance with the **CABI Code of Business Conduct**. However, all organisations face the risk of things going wrong from time to time, and a culture of openness and accountability is essential in order to prevent such situations occurring and to address them if they do occur.

The aims of this policy are to:

- encourage the reporting of suspected wrongdoing as soon as possible, in the knowledge that concerns will be taken seriously and investigated as appropriate, and that confidentiality will be respected;
- provide guidance as to how to raise those concerns;
- give reassurance that genuine concerns may be raised without fear of reprisals, even if they turn out to be mistaken.

Examples of suspected wrongdoing may include bribery, fraud, falsification of records or results, health and safety risks, bullying, sexual or other harassment, safeguarding concerns, conflicts of interest, collusion, price fixing or any other illegal activity. If you are uncertain if something is covered under this policy you should seek advice from Neil MacIntosh, HR Director (n.macintosh@cabi.org).

2. Scope

This policy applies to members of the Board, all CABI employees, officers, consultants, contractors, casual workers and agency workers worldwide. This policy does not form part of any employee's contract of employment and we may amend it at any time.

3. Policy ownership

The Executive Management Team (EMT) has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to any concerns raised, and is accountable to the Board through the Audit & Risk Committee.

4. Definitions

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- criminal activity;
- breaches of Anti-corruption and Bribery Policies;
- financial fraud or mismanagement;
- failure to comply with any legal, professional or regulatory requirements;
- danger to health and safety;
- bullying, sexual or other harassment;
- safeguarding concerns;
- conflicts of interest;
- breach of internal policies and procedures;
- conduct likely to damage our reputation or financial wellbeing;
- negligence;
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of CABI's activities (a whistleblowing concern) you should report it under this policy.

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 those cases you should use the Grievance Procedure or the Dignity at Work Policy (Harassment and Bullying) as appropriate.

5. Assurance to staff

All employees, officers, consultants, contractors, casual workers and agency workers should be assured that if they raise a genuine concern under this policy, they will not be at risk of losing their job or suffering any form of retribution as a result. It is understood that whistleblowers are sometimes worried about possible repercussions.

We aim to encourage openness and will support those who in good faith raise a genuine concern under this policy, even if they turn out to be mistaken. However, if a staff member makes a deliberately false allegation then they will not be protected by this policy. An example of a deliberately false allegation would be where an individual raises an allegation knowing it not to be true simply in order to cause harm to another colleague or in order to obtain some other advantage.

We are committed to this policy and will adopt a zero-tolerance approach to the harassment or victimisation of anyone raising a genuine concern. Whistleblowers will not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the HR Director immediately. If the matter is not remedied staff should raise it formally using the Grievance Procedure.

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

We will consider anonymous disclosures, however an anonymous disclosure may make a proper investigation more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

6. Raising a whistleblowing concern

We want to promote an open and honest workplace for our employees, officers, consultants, contractors, casual workers and agency workers and as part of our commitment to achieving this you may raise any whistleblowing concerns, either:

1. with CABI management

OR

2. if you prefer, by using an independent reporting service

CABI management

In the first instance, any suspicion of wrongdoing should normally be reported to your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively.

If however you reasonably believe that your line manager may be involved in the wrongdoing, or if for any other reason you do not wish to approach your line manager, any concerns should be raised with Neil MacIntosh, HR Director (n.macintosh@cabi.org).

In some circumstances you may prefer to raise the matter directly with another member of the Executive Management Team or with a member of the Board, in particular, if the concern is about sexual harassment or safeguarding.

Executive Management Team contacts

Linda Copsey, Executive Director, IT (l.copsey@cabi.org)

Carol McNamara, Chief Commercial Officer (c.mcnamara@cabi.org)

Board contacts

Professor Dame Anne Glover (a.glover@cabi.org)

Roger Horton, Chair of the Board (r.horton@cabi.org)

Professor Ruth Oniang'o (r.oniang'o@cabi.org)

Independent Reporting Service

We have also retained the services of Navex Global to enable you to report any whistleblowing concerns directly to an impartial third party using telephone, mobile app, or web reporting tools. Navex Global's EthicsPoint Incident Management will report concerns independently to the HR Director. Full contact details for EthicsPoint Incident Management are given below.

Personal interest

If you have any personal interest in the matter, this should be disclosed when the concern is first raised.

7. Investigation process

Once a concern has been raised, the appropriate management will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of this assessment (unless the concern has been raised anonymously). You may be required to attend additional meetings in order to provide further information.

The investigation process will vary according to the circumstances of each case but will always seek to ensure that any concern raised is investigated thoroughly, promptly and confidentially. Depending on the circumstances, the investigation may involve staff from Finance or HR and if appropriate external support, for example, internal audit.

We will aim to keep you informed of the progress of the investigation and the outcome of the investigation will be reported back to you with as much detail as is proper and reasonable to the case. However, sometimes the need for confidentiality may prevent us 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.

8. If staff are dissatisfied with the response

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this. However, if you are not satisfied with the response to your concern you may also raise the matter with the Board, through the Chair of the Board.

9. External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and dealing with any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. The law in a number of countries in which CABI operates recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator and a number of our key donors (eg DFID) also have their own reporting mechanisms.

We would however encourage you to seek advice from a senior member of staff before reporting a concern to anyone external.

Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes concern a third party, such as a donor, customer, supplier or service provider. 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, either directly to CABI management or to the independent reporting service.

10. Roles and responsibilities

Employees

All employees are responsible for:

- complying with this policy;
- in particular, with the requirement not to threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

Line managers

In addition to their responsibilities as employees, line managers are responsible for:

- implementing this policy and related processes;
- working closely with HR to investigate any whistleblowing concerns, as required, and to implement any identified changes within their work area;
- supporting any whistleblower in their work area and ensuring that they are appropriately treated by colleagues and others.

HR

HR is responsible for:

- providing appropriate guidance and training to line managers to support the implementation of this policy;
- providing support to investigations and any required HR support during or following an investigation;
- working with third parties in the effective implementation of this policy;
- monitoring the effectiveness of this policy, through anonymous surveys, analysis of HR data and other appropriate means, and to keep under review procedures and criteria in the implementation of the policy, in discussion with CABI management and employee and/or union representatives (Prospect in the UK).

11. Navex Contact Details (Independent Reporting Service)

Navex Global is an independent company, serving millions of employees working in organisations all over the world. Your call to Navex will not be recorded or traced. If you report your concern via the web, Navex will not trace your IP address.

How does the Navex Global service work?

- Report your whistleblowing concerns to Navex using the contact details below.
- They will issue you with a unique reference that allows you to get back in touch with them, to update your report, or respond to information requests from CABI.
- Navex will pass the details of your report to CABI for investigation.

Web

www.cabi.ethicspoint.com

App

<https://cabi.navexone.eu> (this is a mobile intake URL which can be saved to a phone homepage and used like an app.

Countries with Telephone and Web Reporting

Telephone reporting requires two-stage dialling to be completed to reach a communication specialist, with the following steps:

1. Dial the access number first – this is obtained from the website using the drop-down for the specific country
2. When prompted use the corresponding telephone number for the country
3. The call will then be transferred to a communication specialist to handle the report

Countries with telephone and web reporting:

Brazil
China
Costa Rica
Ghana
India
Kenya
Malaysia
Netherlands
Pakistan
South Africa
Switzerland
Trinidad & Tobago
United Kingdom & NI
USA

Countries with Web Reporting only:

Ethiopia
Kenya
Rwanda
Trinidad & Tobago
Uganda
Zambia

