

WHISTLEBLOWING POLICY

1. Purpose and Scope

Dialogue Earth is committed to the highest standards of openness, integrity, and accountability. We encourage a working culture in which concerns about wrongdoing or risk can be raised in the public interest, without fear of retaliation.

This policy explains how anyone connected to Dialogue Earth can safely report suspected wrongdoing. It applies to all employees, trustees, volunteers, interns, consultants, freelancers, contractors, and others acting on our behalf.

Whistleblowing differs from a grievance, which concerns an individual's personal circumstances. For personal complaints about treatment at work, please refer to our Grievance Procedure.

2. Definitions

Whistleblowing: The reporting of suspected wrongdoing or dangers in relation to the organisation's activities, where the concern is in the public interest. This is legally protected under the Public Interest Disclosure Act 1998.

Wrongdoing may include:

- Criminal offences (e.g. fraud, theft, bribery);
- Breaches of legal obligations or regulatory requirements;
- Miscarriages of justice;
- Serious risk to health and safety;
- Environmental harm;
- Sexual harassment;
- Deliberate concealment of any of the above;
- Other behaviour that may seriously impact the public, stakeholders, or the integrity of Dialogue Earth.

Whistleblower: Any person covered by this policy who raises a concern about wrongdoing in the public interest.

3. Who Can Raise a Concern?

This policy applies to:

- Employees (full-time, part-time, or temporary);
- Trustees;
- Volunteers and interns;
- Contractors, freelancers, and consultants;
- Other third parties with a working relationship with Dialogue Earth.

We also welcome concerns raised by individuals outside the organisation, such as members of the public, journalists, or others, if they have reasonable grounds to believe that serious wrongdoing has occurred in connection with our work.

4. How to Raise a Concern

You are encouraged to raise concerns as early as possible. You do not need firm proof – reasonable belief is sufficient.

When raising a concern, please include:

- A clear description of the issue;
- Relevant facts, including dates, people involved, and locations;
- Any supporting evidence (if available);
- Whether the matter has been raised before and with whom.

You may raise concerns through any of the following channels:

- Your line manager (if applicable);
- Chief Operations Officer (Whistleblowing Officer);
- Chief Executive Officer, if the concern involves the Chief Operations Officer;
- Chair of the Board of Trustees, if the concern involves the CEO;
- If you are external to the organisation, you may also submit concerns via whistleblowing@dialogue.earth. Your disclosure will be handled with the same level of confidentiality, care, and follow-up as internal reports.

5. How We Respond

All disclosures will be assessed to determine next steps. Depending on the nature of the concern, we may:

- Resolve the issue informally;
- Appoint an investigator for an internal review;
- Refer the matter to external regulators or authorities.

We are committed to:

- Responding promptly;

- Treating all concerns sensitively and fairly;
- Keeping the whistleblower informed (where possible);
- Protecting confidentiality.

Where wrongdoing is found, appropriate disciplinary, legal, or remedial action will be taken.

In addition, we commit to using insights from whistleblowing concerns to improve our internal processes and risk management.

6. Confidentiality and Anonymity

We will treat your disclosure in strict confidence and protect your identity wherever possible. We will not reveal your identity without your consent unless required by law or if it is essential to the investigation.

You may raise concerns anonymously. While we will do our best to investigate anonymous concerns, the ability to do so thoroughly may be limited.

7. Protection from Reprisal

If you raise a concern in good faith under this policy, you will be protected from retaliation. This applies even if the concern proves to be unfounded.

Retaliation, including harassment, dismissal, demotion, or victimisation, will be treated as a serious disciplinary offence.

If you believe you have suffered reprisal, please report it immediately to the COO or CEO.

Knowingly making false or malicious allegations may result in disciplinary action.

Dialogue Earth is committed to protecting whistleblowers in line with the Public Interest Disclosure Act 1998.

8. Misuse of the Whistleblowing Procedure

Dialogue Earth is committed to protecting the integrity of its whistleblowing process. Whistleblowing is a vital mechanism for identifying serious wrongdoing, but it must not be used to pursue personal grievances or harass individuals.

We recognise that whistleblowing reports can come from both internal and external sources. However, submissions made in bad faith, or as part of a pattern of harassment, will not be tolerated. Where there is evidence that the whistleblowing

process is being misused to target or intimidate staff members, the organisation reserves the right to:

- Decline to investigate the complaint;
- Take steps to protect affected individuals, including engaging with law enforcement;
- Limit or block communications from those who raise vexatious and/or repeated requests;
- Seek legal advice on appropriate remedies.

Dialogue Earth has a duty of care to its employees and will take seriously any concerns about malicious or harassing behaviour, including the use of whistleblowing channels for such purposes. This applies equally to complaints made anonymously or from third parties.

9. External Reporting

If you do not feel safe or comfortable reporting internally, you may raise your concern with an appropriate external body, such as:

- Charity Commission: whistleblowing@charitycommission.gov.uk;
- Protect (formerly Public Concern at Work): www.protect-advice.org.uk / Tel: 020 3117 2520.

We encourage anyone considering external disclosure to seek independent advice.

10. Record Keeping and Data Protection

All whistleblowing concerns will be logged securely by the COO and retained in line with our Data Protection Policy and UK GDPR regulations.

Records will include:

- The nature of the concern;
- Actions taken;
- Outcomes and follow-up;
- Any correspondence with the whistleblower (where applicable).

Mistakes happen – what matters most is prompt reporting.

Failing to report a known issue is considered a serious breach of this policy.

Review and Policy Changes

This policy will be reviewed annually, or sooner if legislation or best practice changes.

Last Review:	April 2026
Next Review:	April 2027