

# Whistleblowing Policy

## 1. Purpose

CSA is committed to maintaining a culture of openness, accountability, and integrity. This Whistleblowing Policy provides a clear and secure mechanism for raising concerns about suspected wrongdoing, misconduct, or unethical behavior within CSA. It aims to protect anyone who raises concerns in good faith from retaliation.

## 2. Scope

This policy applies to all CSA staff globally, including employees, contractors, volunteers, trustees, board members, consultants, suppliers, and partners. It applies to any misconduct linked to CSA operations, whether occurring locally or internationally.

## 3. What is Whistleblowing?

Whistleblowing is the act of reporting concerns about suspected wrongdoing that affects CSA, its people, its beneficiaries, or the public interest. This policy covers reports concerning:

- Financial misconduct, fraud, or theft
- Corruption or bribery
- Breaches of legal or regulatory requirements
- Abuse or exploitation (including sexual misconduct)
- Harassment or bullying
- Health and safety risks
- Environmental damage
- Abuse of power or authority
- Deliberate concealment of any of the above

## 4. CSA's Commitment

CSA will:

- Treat all concerns seriously and investigate fairly
- Protect whistleblowers from retaliation, victimization, or dismissal
- Ensure confidentiality is maintained wherever possible
- Act on findings in line with disciplinary procedures, legal obligations, and our values

## 5. Reporting Concerns

Anyone who has a genuine concern about misconduct should report it without fear. Reports can be made verbally or in writing to:

- Your Line Manager
- The Safeguarding Officer
- The CSA Director

Alternatively, reports can be submitted anonymously via CSA's Whistleblower channels.

## 6. How to Raise a Concern

When reporting, please provide as much detail as possible to support investigation efforts:

- What happened, when, where, and who was involved
- Any witnesses
- Any supporting evidence

Concerns should be reported promptly to help ensure swift action.

## 7. Investigation Process

All concerns raised will be acknowledged, assessed, and, where appropriate, investigated by someone independent of the concern. Investigations will be confidential and handled with sensitivity.

CSA will:

- Clarify details with the whistleblower where possible
- Appoint an impartial investigator
- Keep the whistleblower informed within the bounds of confidentiality
- Take action in line with findings, up to and including disciplinary measures or reporting to authorities

## 8. Confidentiality and Protection

CSA will protect the identity of whistleblowers wherever possible. Information is shared strictly on a need-to-know basis. CSA cannot guarantee anonymity if legal processes require disclosure, but we will seek to protect individuals from harm.

Retaliation or victimization against anyone raising a genuine concern will lead to disciplinary action.

#### **9. False Allegations**

Reports made maliciously or in bad faith are a serious breach of this policy and will result in disciplinary action. Whistleblowing must be done with honest intentions and reasonable belief.

#### **10. Abuse of the Policy**

This policy must not be used to pursue personal grievances or employment disputes. Such matters should be raised through CSA's grievance procedures. Misuse of this policy for personal gain or false allegations will result in disciplinary action.

#### **11. Legal Framework**

Although this policy operates globally, CSA aligns with the principles of the UK Public Interest Disclosure Act (1998), which protects individuals who raise concerns in the public interest. CSA extends these protections regardless of jurisdiction.

#### **12. Monitoring and Review**

CSA's Compliance Team will monitor the use of this policy and report trends to senior management and the Board. This policy is reviewed every two years, or sooner if legal or organizational changes require.