



GOAL Whistleblowing Policy

June 2023

GOAL Whistleblowing Policy

Member:	All board members/trustees, board committee members and company members of each of GOAL, GOAL (International) and GOAL USA Inc. (GOAL USA), together with GOAL's branches/liaison offices in programme countries; all GOAL employees (Head Office and Field), secondees, interns and volunteers; and all consultants/contractors/suppliers (including internal consultants with a GOAL email address), all GOAL partners.
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1. Introduction

In order to maintain our high standards, GOAL encourages the reporting of actual or perceived wrongdoing, including on the part of a member of GOAL staff (including all GOAL Head Office and Field staff), all GOAL entities' Boards of Directors, consultants, secondees, interns, volunteers, visitors, implementing partners, contractors, donors, and vendors.

This Whistleblowing Policy (hereinafter 'policy' or 'Whistleblowing Policy') is designed to provide a means whereby actual or perceived wrongdoing can be reported in confidence and without fear of retribution. This policy has been developed to assist GOAL staff in making a disclosure should they encounter a suspected wrongdoing. It gives examples of possible wrongdoings which may arise and provides guidance to assist GOAL staff in deciding whether a matter should be raised through this policy or through another mechanism (such as employee grievance procedures which should be reported under GOAL Human Resources Policies).

The policy encourages that disclosures be made internally to the GOAL Complaints Response Director (Section 7). The policy acknowledges that in certain circumstances it may be more appropriate to make a disclosure externally and the policy references an externally managed hotline for this purpose. Details of various external agencies such as Donor Organizations or Regulatory Authorities to whom it is possible to make a disclosure are also provided within the policy.

GOAL is committed to the following core principles:

- Any matter of concern brought to our attention will be treated seriously.
- GOAL will make every effort to ensure the identity of a person raising a concern will remain confidential unless they indicate otherwise.
- If a complainant chooses to have his or her identity known, GOAL will take every measure to ensure they are not subject to any form of harassment or victimisation.
- The complainant will be made aware of the focal point for their investigation.
- If a GOAL staff member raises a matter that is found to be malicious in intent, i.e., not founded on any reasonable concern and found to be entirely without foundation, they will be subject to disciplinary action.

2. Applies To

This policy seeks to set out GOAL's whistleblowing processes and procedures and applies to all Members of GOAL.

"GOAL" includes GOAL, GOAL (International), GOAL USA Inc. (GOAL USA) and all GOAL branches and/or liaison offices in programme countries and any subsequent subsidiaries/affiliates incorporated from time to time.

"Members" are defined as:

- i. All board members/trustees, board committee members and company members of each of GOAL, GOAL (International) and GOAL USA Inc. (GOAL USA), together with GOAL's branches/liaison offices in programme countries.
- ii. all GOAL employees (Head Office and Field), secondees, interns and volunteers.
- iii. all consultants/contractors/suppliers (including internal consultants with a GOAL email address); and,
- iv. all GOAL partners (i.e., those entering into partnership agreements with GOAL, GOAL (International) and GOAL USA Inc (GOAL USA).

3. Purpose

The GOAL Whistleblowing Policy is intended to encourage and enable genuine concerns about actual or perceived wrongdoing within GOAL or its Partners to be raised, including by staff members, board members, Partners, suppliers, contractors, volunteers, and communities.

Under the GOAL Whistleblowing Policy, a person can make a disclosure without fear of suffering penalty, threat, less favourable treatment, discrimination or disadvantage.

The GOAL Whistleblowing Policy has been developed, in line with best practice. It references a number of sources including existing GOAL policies, as well as legislation including the Irish Protected Disclosures Act 2014 as amended by the Protected Disclosures (Amendment) Act 2022, as well as the UK Employment Rights Act 1996 as amended.

Where, in a GOAL country of operation, other statutory whistleblowing requirements and procedures exist, these must be fully complied with. In such situations, GOAL Country Directors are obliged to make their staff fully aware of local legislation that may impact upon the GOAL Whistleblowing Policy.

For Irish and UK based employees please see additional legal protections afforded under Irish and UK law at Annex 3.

The GOAL Whistleblowing Policy does not seek to replace any other GOAL policy, guideline, Code of Conduct, or any of the directions outlined in the GOAL Employee Handbook. Members of GOAL are encouraged to consider carefully whether a concern should be raised through this policy or through another GOAL Policy. If a concern is raised under the GOAL Whistleblowing Policy that falls more appropriately within the terms of another GOAL policy, the complainant will be informed of this and that their concern has been referred to an alternative process under an appropriate policy. A concern should be raised under the Whistleblowing Policy if the complainant considers it to be in the best interests of the public and/or GOAL that the matter be dealt with. Or, conversely, if they believe it will be to the detriment of the public and/or GOAL if the matter is not dealt with. If an issue of personal grievance is raised under the GOAL Whistleblowing Policy, it will be referred to and dealt with under the GOAL Grievance Procedure as set out in the GOAL Employee Handbook.

GOAL is committed to handling all concerns brought to our attention in a wholly confidential and professional manner.

4. Disclosures

The GOAL Whistleblowing Policy deals with disclosures of suspected wrongdoing, on the part of individuals or groups of people, related to GOAL's work. It is designed to enable concerns about malpractice or impropriety to be raised confidentially, at a high level. The GOAL Whistleblowing Policy is intended to cover concerns that may initially be investigated separately and might lead to the instigation of disciplinary proceedings. In a non-exhaustive summary, issues of concern might relate to:

- a) A failure by GOAL members to comply with any legal obligations arising under their contract of employment with GOAL.
- b) A miscarriage of justice, as it pertains specifically to GOAL's work.
- c) Health and safety risks, including risks to the public, GOAL staff, volunteers, consultants, or the staff of Partner organisations.
- d) Damage to the environment.
- e) The unauthorised use of funds or resources (including but not limited to fraud, corruption, bribery, or blackmail) contrary to the GOAL Anti-Fraud Policy.
- f) Oppressive, discriminatory, or grossly negligent actions or inactions by GOAL staff, or anyone acting on behalf of GOAL.
- g) Offences that are being, or are likely to be, committed.
- h) Evidence of wrongdoing being hidden or destroyed by GOAL staff, or by persons acting on behalf of GOAL.
- i) Non-compliance with the GOAL Code of Conduct or any GOAL policy including, Child Protection Policy, Child and Adult Safeguarding Policy, the Protection from Sexual Exploitation, Abuse and Harassment Policy.,
- j) Any harm caused by an individual of an organisation contracted by GOAL (employee, volunteer, trainee, consultant, Partner). Harm done can be physical, sexual, emotional, discriminatory and can lead to situations of exploitation and/or abuse of power.

A disclosure under this policy may be about an actual or perceived wrongdoing that:

- is happening now.
- is about to happen.
- has taken place in the past.

In all likelihood, there will occasionally be some confusion around what constitutes a personal grievance as opposed to a whistleblowing disclosure. If an issue raised through GOAL's community feedback mechanisms (CFMs)¹ is deemed to be a whistleblowing disclosure, it must be reported to the **Complaints Response Director** within 24 hours. If it is deemed by the Complaints Response Group to be outside the scope of this policy, it will be appropriately referred to the relevant department within 24 hours. A disclosure made in line with this policy may sometimes be more appropriately addressed via the GOAL Personal Grievance procedure as set out in the GOAL Employee Handbook.

¹ These in-country mechanisms are designed to focus primarily on community members, but are also available to Partners, GOAL staff (for non- HR issues) and government officials. The primary focus is on identifying programme quality issues; however, fraud and abuse disclosures can be and are captured.

5. Reasonable Belief

A person reporting an issue of concern does not need to be certain that wrongdoing has taken place. It is sufficient that they have reasonable belief that a wrongdoing was, is, or may be about to be committed.

6. Who is Covered by this Policy?

1. **Internal staff:** The GOAL Whistleblowing Policy applies to all members of GOAL staff, whether they be full-time at head office or a field office, volunteer or part-time, members of the Board or employed as a consultant. This policy also applies to past employees, and those at the recruitment stage.
2. **Others:** We also encourage Partners, and the communities GOAL works with, the private sector and suppliers of goods and services to GOAL, to report any suspected wrongdoing in a GOAL operation or at any level within GOAL Channels for Making a Disclosure

7. The Role of the ‘Complaints Response Director’

GOAL is ultimately responsible for the management of this policy. GOAL has appointed a senior executive, the **Complaints Response Director**, who will be responsible for the maintenance and day-to-day operation of this policy. The **Complaints Response Director** is based in GOAL HQ in Dublin and reports to the GOAL CEO, the Audit and Risk Committee and the GOAL Board. Independent assurance on processes set out herein are provided by GOAL’s Internal Audit function.

The GOAL **Complaints Response Director** is empowered to act on any issue that falls under the remit of the Whistleblowing Policy.

The contact details for the **Complaints Response Director** are:

Phone: (01) 280 9779

Email: speakup@goal.ie

Address: Complaints Response, Carnegie House, Library Rd, Dun Laoghaire, Dublin, Ireland

8. Channels for Making a Disclosure

The GOAL Whistleblowing Policy provides guidance for all its clients on making:

- An internal disclosure, as further set out in Section 9 below.
- An external disclosure to others, as further set out in Section 10 below.

9. Making a Disclosure Internally

As a first step, a disclosure about an actual or perceived wrongdoing should normally be raised using GOAL's internal disclosure procedures. However, this depends on the seriousness and sensitivity of the issues involved, and who is suspected of the wrongdoing.

Disclosures made under internal procedures may be made verbally or in writing to the Complaints Response Director as nominated by GOAL. Those who wish to make a written disclosure are invited to use the following format (see box, below). A complainant should keep a copy of the disclosure and any information they have provided. It is not necessary to follow this format precisely, but it is important to include the following type of information:

Suggested format for making an internal disclosure

1. Give a broad description of the actual or perceived wrongdoing.
2. Provide detailed information that will assist an investigation, such as the nature of the actual or perceived wrongdoing, dates, location(s), individuals/groups involved.
3. Date of the disclosure.
4. Preferred contact details (if any).

Although a complainant is not expected to prove the veracity or otherwise of a disclosure, there must be a reasonable belief that grounds exist for raising a concern when using the internal procedure.

If a disclosure or concern is raised outside of this policy the person receiving the concern, such as a line manager, is obligated to direct the complainant to this policy, and to ensure the complaint is reported to the **Complaints Response Director** within 24 hours.

10. Making a Disclosure Externally

GOAL members, communities, suppliers, and Partners are encouraged to raise their concerns in the first instance under GOAL's internal disclosure procedure. It is recognised, however, that this may not always be the preferred means of reporting. This policy, therefore, also provides for external reporting. In that context, GOAL has engaged the services of an external independent whistleblowing hotline provider called Safecall. where whistleblowing disclosures can also be made.

Safecall can be contacted on a 24-hour basis from anywhere in the world. Disclosures made through Safecall are confidential and can also be anonymous and can include as much relevant information as possible before being passed to GOAL. Disclosure reports from Safecall will be passed to the **Complaints Response Director** for action, or where this is not appropriate, to the CEO or GOAL's Board of Directors.

Contact details: Safecall / www.safecall.co.uk/report / goal@safecall.co.uk

GOAL also aims to maintain, and make generally available to our staff, an up-to-date list and contact details of the various external agencies to whom it is possible to make a disclosure. GOAL will also share relevant matters that may be reported to them.

These external parties include, but are not limited to, GOAL's donors (please see contact details at Annex 2:

1. OIG (Office of the Inspector General US government):
2. FCDO:
3. ECHO:
4. Irish Aid:
5. EU:

These organisations may have their own reporting format, but the below gives an idea of the information a complainant will need to provide (please remember to keep a copy of all your correspondence).

For employees in Ireland or the UK, disclosures can be made to additional prescribed persons. Please see Annex III for details

Suggested format for complainant making a disclosure externally

- Detailed description of the suspected wrongdoing, including date(s) and location.
- If possible, copies of information that tends to support suspicions.
- Information relating to why concern was not raised under GOAL's internal procedure.
- Date of the disclosure.
- Complainant's contact details.
- Complainant must make clear whether (i) to keep details personal details confidential or (ii) complainant's name can be associated with the disclosure.

11. Disclosures from External Parties to GOAL (Partners, Staff or Communities from outside GOAL)

People employed by GOAL's Partners or suppliers who suspect wrongdoing may also make a report to the organisation's **Complaints Response Director** or to Safecall.

Details of how to make a disclosure through the **Complaints Response Director** or Safecall will form part of all contracts or agreements with GOAL's Partners or suppliers.

Anyone from outside GOAL making a disclosure is encouraged to use the same format as our staff and indicate whether they are willing to participate in an investigation in response to their disclosure.

12. Confidentiality

All matters raised will be treated in confidence., unless a complainant "explicitly consents" that they have no objection to their name or any information from which the identity of the reporting person may be directly or indirectly deduced being disclosed. All matters raised, and the associated information will be kept secure, and in a manner that protects confidentiality and complies with GOAL's obligations under our Data Protection Policy. The focus will always be on the information provided, rather than the identity of the person providing the information. GOAL will also work to protect the identity of any person against whom a complaint is made.

However, there may be exceptional circumstances (including where required by law) where the identity of the person making the disclosure may have to be revealed.

13. Anonymous Allegations

Concerns expressed anonymously through the channels listed above will be treated seriously, and in accordance with this policy. GOAL respects the choice of anyone who wishes to remain anonymous. However, allegations are often more difficult to investigate when a complainant remains anonymous, and the outcome of an investigation can be affected. Therefore, while GOAL accepts anonymous complaints and respects the wishes of those who wish to remain anonymous, GOAL nonetheless encourages people making disclosures to share their contact details with the **Complaints Response Director** to enable a more effective response.

14. How GOAL will Respond

The **Complaints Response Director** will respond fully and appropriately to all concerns raised under the internal disclosure procedure. Safeguarding complaints will also be referred to the Global Safeguarding Advisor for advice and assistance (Safeguarding complaints are defined as relating to any incident of physical abuse, sexual abuse, child abuse, sexual exploitation, child exploitation or repeated harassment concerning GOAL, GOAL staff or GOAL partners).

Depending on the seriousness of an allegation, urgent action may be required before an investigation is launched (for example, removing a health and safety hazard or suspending a person from duty or reducing his/her access to programmes to prevent a serious incident).

Disclosures may, depending on the seriousness of an allegation(s), be referred immediately to the appropriate authorities, and to donors as appropriate or where required.

Confidentiality will be maintained in accordance with this policy. We aim to protect the rights of our staff, including any individual against whom an allegation is made, during and following any investigation. Matters raised in a disclosure may, where appropriate:

- be investigated by GOAL's Investigation Department, Global Safeguarding Advisor or Internal Audit.
- be referred to an external auditor.
- be referred to an external enforcement agency or regulator.
- form the subject of an independent (third party) inquiry.
- be dealt with in accordance with GOAL's grievance and disciplinary procedures.

Within 7 days of a non-serious concern being raised the Complaints Response Director will acknowledge receipt in writing to the person(s) who made the report (where this is known). In respect of a serious disclosure, written acknowledgement will be made within 72 hours. **No acknowledgement will be issued if the reporting person explicitly requests otherwise.** The acknowledgement will:

- note that the concern has been received.
- Indicate in summary form how the organisation proposes to deal with the matter.
- Give an estimate of how long it will take to provide the next response; or
- Provide an approximate date by which the person making the disclosure will receive the final communication.
- or
- Set out the reasons why no investigation will take place.

The initial communication from the **Complaints Response Director** will include information on staff support mechanisms that may be available to the person making the report.

Feedback will be provided to every person making a disclosure within a reasonable period, no longer than 3 months after the acknowledgement of the complaint and every 3 months thereafter as long as a case remains open.

During an investigation, the amount of contact between the **Complaints Response Director** (or someone acting on his/her behalf) and the person making the disclosure will depend on the nature of the issue(s) raised and the clarity of the information provided in the initial report.

The **Complaints Response Director** will ensure that the person who made the disclosure is aware that the matter is under active consideration; and will provide them with a final statement regarding the conclusion of the case. If the investigation proves particularly lengthy, contact will be maintained with the person who made the disclosure at regular intervals.

In circumstances where an investigation concludes that no wrongdoing has occurred, or where the person making the disclosure is mistaken or unaware of all the relevant facts, the **Complaints Response Director** will, in a final statement, explain that the concerns were unsubstantiated.

The **Complaints Response Director** will securely maintain a record of all concerns raised and reports received, as well as notes of the investigation and the outcome. This will be done in such a way as to maintain confidentiality, and, where concerns have been proven unsubstantiated, seek to ensure the reputations and employment records of staff are not harmed.

GOAL is obligated to report any wrongdoing connected to a donor-funded project according to the procedures of that donor. GOAL's main donors also have independent whistleblowing mechanisms, through which disclosures can be made (refer to Annex II for details).

15. False Allegations

Where a reporting person makes a report in bad faith, containing any information that they know to be false, disciplinary action may result.

16. Untrue Allegations

If someone makes a report in good faith, with a reasonable belief of wrongdoing, regardless of whether the information or allegation is or is not confirmed by an investigation, no action will be taken against the complainant. They will be fully protected from any unfavourable treatment, penalisation or victimisation.

17. A Staff Member who is the Subject of a Disclosure

A staff member who is the subject of an allegation is also entitled to fair treatment. Pending the outcome of an investigation, all reasonable steps will be taken to protect the identity of those who are the subject of allegations. In some circumstances, the conclusion of an investigation may be followed by a statement of exoneration.

18. Protection from Penalisation

GOAL is committed to good practice and maintaining the highest possible standards. As an integral part of this, we will support and protect anyone who raises an issue of concern under the Whistleblowing Policy against penalisation or threats of penalisation.

Direct or indirect pressure on workers not to raise an issue, or to raise an issue contrary to the Whistleblowing Policy, or to hinder or attempt to hinder a worker in making a report will not be tolerated and may result in disciplinary action.

GOAL recognises that such pressure can take many forms; it may be direct or indirect, and may be applied by fellow staff members, management, partners, or those who supply us with goods and services.

Examples of such pressure include, but are not restricted to, unfair or adverse treatment (whether by commission or omission) that result in the employee suffering any unfavourable change in his/her conditions of employment including (but not limited to):

- i. suspension, lay-off or dismissal (including a dismissal within the meaning of the Unfair Dismissals Acts) or the threat of suspension, lay-off or dismissal.
- ii. demotion or loss of opportunity for promotion.
- iii. transfer of duties, change of location of place of work, reduction in wages or change in working hours.
- iv. imposition of any discipline, reprimand or other penalty (including a financial penalty);
- v. unequal treatment under sick leave or disciplinary policies, unfair selection for tasks or attendance at events.
- vi. coercion, intimidation.
- vii. discrimination, disadvantage, or unfair treatment.
- viii. injury damage or loss.
- ix. threats of reprisal.
- x. verbal harassment - jokes, comments, ridicule, or songs.
- xi. written harassment - including faxes, text messages, emails, comments, or postings on social media.
- xii. physical harassment - jostling, shoving or any form of assault; intimidatory harassment - gestures, posturing or threatening poses.
- xiii. isolation or exclusion from social activities.
- xiv. bullying.

GOAL will not penalise or threaten to penalise a person for raising an issue based on a reasonable belief under the GOAL Whistleblowing Policy. GOAL will not allow any other person to penalise or threaten penalisation (including informal pressure such as those examples listed above) for raising an issue under the Whistleblowing Policy. Country Directors, line managers and HR have a particular responsibility to protect staff from unfair, adverse treatment, because of disclosing a concern.

GOAL will take appropriate action to prevent and remedy any penalisation or breach of confidentiality of GOAL staff when they report a suspected wrongdoing or:

- i. are suspected of making a report about a suspected wrongdoing.
- ii. provide information or act as a witness as part of an investigation under this policy.
- iii. or are otherwise involved in actions under this policy.

These protections extend beyond the workplace; for example, to conferences and training that occur outside the workplace, and to work-related social events.

Penalisation or threats of penalisation by members of staff will not be tolerated. Such behaviour may constitute misconduct and may lead to disciplinary action up to and including dismissal.

Penalisation or threats of penalisation to our workers by suppliers, Partners, and others we do business with, will not be tolerated. Such action(s) may lead to the termination of contracts, a suspension of services, or the exclusion from GOAL premises or the imposition of other sanctions.

19. Complaints on Breach of Procedure

A complaint of penalisation, or a complaint of breach of confidentiality under this policy, can be made in accordance with GOAL's Human Resources Policy, or to the Complaints Response Director or reported to Safecall. Any complaint of penalisation should be brought to the attention of the **GOAL Complaints Response Director** or, where appropriate, to GOAL's CEO or Board.

20. Communication, Monitoring and Review

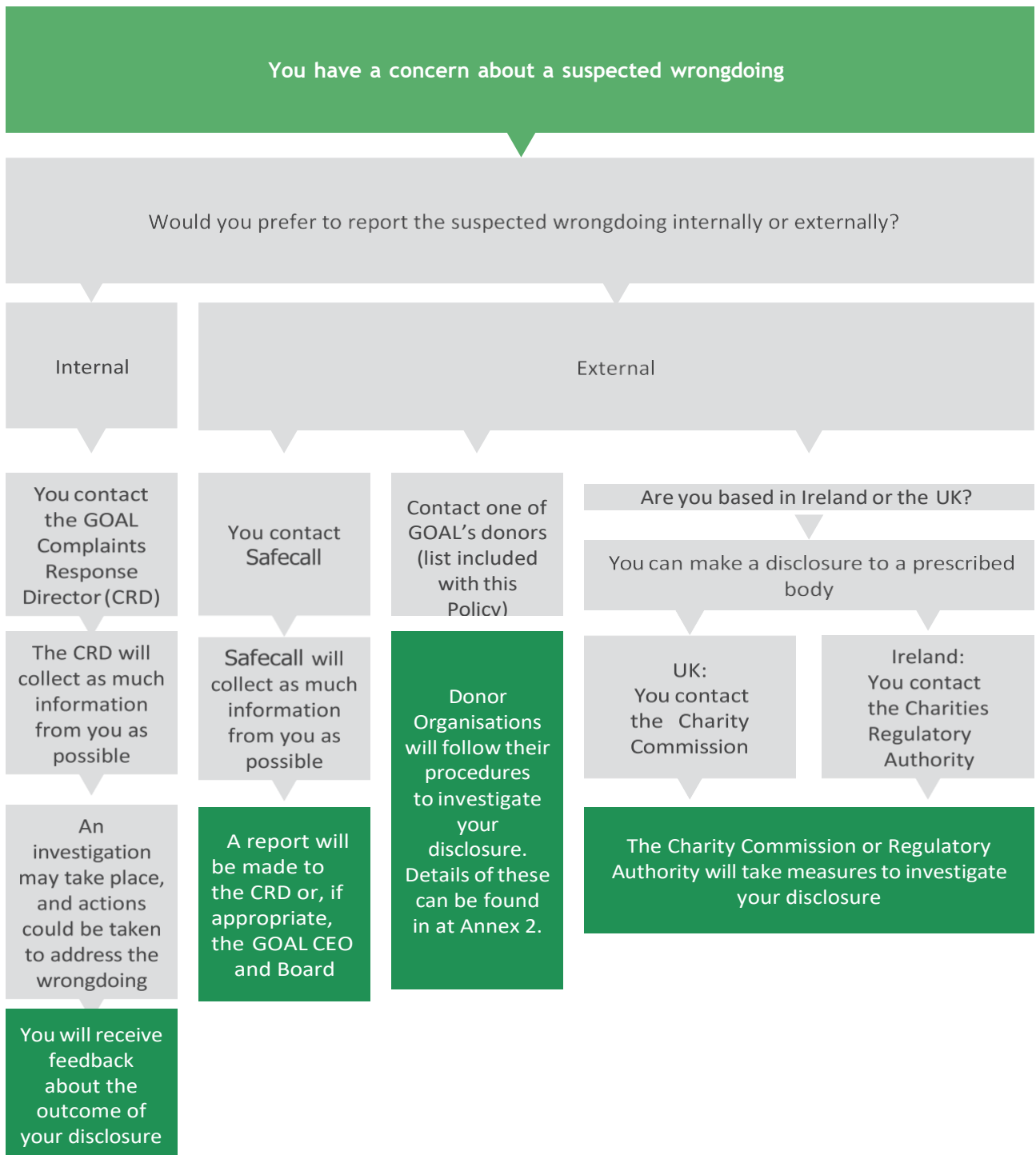
This policy will be communicated to all GOAL staff including all GOAL Head Office and Field staff, all GOAL entities' Boards of Directors, consultants, secondees, interns, volunteers, visitors, partners, and others we do business with. SpeakUp posters should be displayed prominently in every GOAL country office. This policy will be constantly monitored for its effectiveness and be reviewed annually.

21. Related Policies

The GOAL Whistleblowing Policy is linked to, and should be read in conjunction with the following:

- Core Humanitarian Standards Alliance
- GOAL Code of Conduct
- GOAL Anti-Fraud Policy
- GOAL Complaints and Response Mechanism Guidelines and toolkit (focused on programme community complaints)
- GOAL Community Information Sharing Guidelines
- Child and Adult Safeguarding Policy
- GOAL Child Protection Policy
- GOAL Protection from Sexual Exploitation, Abuse and Harassment (PSEA) Policy
- GOAL Personal Grievance Procedure
- GOAL Employee Handbook
- GOAL Conflict of Interest Policy

Annex I. Progressing Concerns About a Suspected Wrongdoing



Annex II: Donor Contact information

OIG - US Government

By Mail:

U.S. Department of State Office of Inspector General

P.O. Box 9778

Arlington, VA 22219

By phone:

1-800-424-5197

Hotline email address:

<https://www.oig.doc.gov/Pages/Hotline.aspx#complainthotline>

The Office of Inspector General Hotline is a clearinghouse for receiving and handling allegations regarding fraud, waste, abuse, mismanagement, or misconduct affecting Department of State programmes and operations.

The OIG asks individuals to think carefully about the allegation and the information available that can help the OIG determine whether mismanagement or criminal conduct has been committed. To process allegations, the OIG asks individuals to provide as much information as possible regarding the suspect and victim.

Information should include:

- Who committed the wrongdoing (person, company, or organisation)?
- What exactly did the individual or entity do?
- Where did the activity take place?
- When did it happen?
- How was the activity committed?
- Is it known why the person committed the wrongdoing?
- Who else has knowledge of the potential wrongdoing?

Without sufficient information the OIG may be unable to act upon an allegation. The more information that can be provided, the better chance the OIG have of determining whether any wrongdoing has been committed. The OIG is very interested in information regarding waste, fraud, abuse, mismanagement, or misconduct in DOS programs.

FCDO

How to report wrongdoing

The FCDO Internal Audit Department's fraud and safeguarding investigation team is for raising concerns, suspicions and/or allegations of fraud, sexual exploitation and abuse or other corrupt practices. Your information will be treated in confidence. You do not have to provide your name, but doing so will assist us in taking forward your concerns.

The Unit has a dedicated secure e-mail address for raising all concerns and suspicions of fraud:
reportingconcerns@fcdo.gov.uk

Alternatively, any concerns can be reported by calling the confidential hotline at:

+44 (0) 1355 843747 In writing to:

Director of Internal Audit & Investigations
Foreign, Commonwealth & Development Office
King Charles Street
London
SW1A 2AH
United Kingdom

Information will be treated in confidence and the name of the complainant does not have to be provided.

ECHO

By calling:

00 800 67891011

In writing to:

Directorate-General for European Civil Protection and Humanitarian Aid Operations
European Commission
1049 Bruxelles/Brussel
Belgium

Fraud concerns regarding programmes funded by ECHO can be reported at the following email address:

ECHO-REPORTMISCONDUCT@ec.europa.eu

Irish Aid

Irish Aid can be contacted in writing to:

Riverstone House, 23 - 27 Henry Street Limerick
V94 R7YE

By calling:

+353 1 408 2000

EU

The European Anti-fraud Office OLAF can investigate allegations of:

- fraud or other serious irregularities with a potentially negative impact for EU public funds, whether EU revenue, expenditure or assets held by the EU institutions.
- serious misconduct by Members or staff of EU Institutions and bodies.

OLAF cannot investigate allegations of:

- fraud with no financial impact on the EU public funds. Please report such allegations to the national police.
- corruption which doesn't involve members or staff of EU Institutions and bodies. Please report such allegations to the national police.
- fraudulent use of the EU logo or the name of EU institutions.

It is possible to report as follows:

Online via the Fraud Notification System

(anonymous, with secured document transmission)

Go to the following website for instructions - https://anti-fraud.ec.europa.eu/olaf-and-you/report-fraud_en (available in English, French, German, Dutch)

Report by post

European Commission

European Anti-Fraud Office (OLAF)

1049 Brussels

Belgium

Annex III: Additional legal protection for Irish and UK Workers

GOAL staff working in Ireland and the United Kingdom have additional legal protections in accordance with domestic law. and can make a “Protected Disclosure” that is based on a reasonable belief.

In Ireland (ROI) these protections are provided by the Irish Protected Disclosures Act 2014 as amended by the Protected Disclosures (Amendment) Act 2022. An Addendum to this Policy for GOAL staff working in Ireland, which explains these legal protections in greater detail can be viewed [here](#).

In the UK these protections are provided by Part IVA of the Employment Rights Act 1996 as amended by the Public Interest Disclosure Act 1998, which can be viewed [here](#).

These acts give legal protection to whistleblowers making a protected disclosure from civil liability, defamation, unfair dismissal, or any form of penalisation as a result of making a disclosure. GOAL’s policy framework is designed to ensure that none of these do occur, but if they do, Irish and UK law offers robust legislation for redress.

Making an external disclosure:

In addition to the means of making a disclosure listed under this policy GOAL staff in the UK and Ireland can also make a disclosure to third parties including prescribed bodies under the relevant legislation.

Although a complainant is not required to provide proof of the alleged wrongdoing in the disclosure, they must be able to show that they have a reasonable belief that their information and allegation are substantially true. This is a somewhat higher standard than when making an internal disclosure. If in Ireland or the UK, when making a disclosure to a third party, you should state that the disclosure is made under the appropriate domestic Act and state if you do/do not expect confidentiality.

For GOAL staff working in Ireland (ROI), Section 8 of the addendum provides further information on other reporting channels.

For GOAL staff working in the UK, Part IVA, 43D-43F of the [Employment Rights Act 1996](#) as amended and The [Public interest Disclosure \(prescribed Persons\) Order 2014](#) provides further information on other reporting channels.