Reporting Concerns Policy

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1 Policy Summary

The Cherie Blair Foundation for Women's Reporting Concerns Policy is in place so that all those who work with, represent or receive support from the Foundation feel safe in raising any concerns about the Foundation, its activities or services. This Policy has been designed with women in mind and is based on key principles that follow a four-stage process: Prevent, Encourage, Respond and Learn.

2 Policy Statement

The Cherie Blair Foundation for Women (the Foundation) has created this Reporting Concerns Policy so that any individual or representative or organisation that works with or receives support from the Foundation feels safe in raising any concerns that they consider may be a breach of the Foundation's Code of Conduct, Safeguarding policy or other relevant policies. This policy can also be used to raise concerns around any activity that may be deemed as illegal, unjust, dangerous or causing harm to others. Furthermore, this Policy can also be utilised to raise any concerns about the services that the Foundation provides or the behaviour of Foundation employees.

The Cherie Blair Foundation for Women works with women entrepreneurs worldwide so they can reach their full potential. This Policy has been designed with women in mind. We encourage anybody but particularly the women we work with to utilise this Policy.

The Foundation's Reporting Concerns Policy is based on key principles that follow a four-stage process:

Prevent harm from occurring by

- Clearly state the standards of behaviour for staff and all those engaged by Foundation in the Staff and Non-Staff Code of Conduct documents

Encourage all stakeholders to report concerns by

- Ensure that everyone feels able to, and understands their responsibility to, speak up when they see or experience behaviour that doesn't feel right;
- Listen to those who raise a concern and treat them with respect
- Never blame the individual raising the concern
- Support individuals to report an incident to the police or other relevant authorities if they wish

Respond sympathetically but strongly when harm or allegations of harm occur by

- Give the individual reporting the concern as much time as they need to discuss or raise the issue, we will never push an individual to share any information they feel uncomfortable sharing
- Acknowledge that it takes strength to talk about safeguarding violations or similar concerns
- Never impose a solution or force anybody to make any decisions
- Ensure anyone raising a concern does not suffer any unfair or negative treatment

Learn from every concern reported.

We will take the necessary steps within the resources available and as appropriate to support welfare and safety of the individual raising the concern.

3 Policy Implementation Framework

3.1 Governance accountability

The Foundation's Board of Trustees are ultimately accountable for overseeing the proper management of Foundations' policies.

The Foundation has identified an individual Trustee to be the Board-level Safeguarding champion, who is named in the Safeguarding policy.

3.2 Management responsibility

The Executive Director holds senior management responsibility for developing and implementing this Policy.

3.3 Scope and application

This Policy applies directly to all Foundation trustees, staff, contractors, suppliers, volunteers, interns, fundraising campaign members, programme participants, mentee referral partners, programme implementation partners, and donors. This list is not exhaustive.

3.4 What types of concerns may be raised under this Policy?

This Policy may be used if, in relation to Foundation supported activities:

- someone is asked to do something or is aware of the actions of others which they consider to be a breach of the Staff or Non Staff Code of Conduct or any of the Foundation's policies;
- someone witnesses behaviour they consider to be wrong, dangerous or illegal;
- there is any incident of fraud, theft, bribery, corruption, or terrorist financing
- someone is concerned about the standard of service you should expect from the Foundation or it's implementing partners
- someone is concerned about the behaviour of a Foundation staff member (including Trustees) or associated personnel[1].
- someone is concerned about a failure to comply with legal obligations; and/or
- any safeguarding issue arises.

This list is not exhaustive.

The Foundation places a mandatory obligation on all employees, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation.

3.5 How to raise a concern?

Concerns may be made using any of the following methods:

- Talk to any Foundation staff member or Trustee
- By email to safeguarding@cherieblairfoundation.org . Email is preferred where possible. If email is not feasible, you can contact us in writing to Cherie Blair Foundation for Women, PO Box 60519, London W2 7JU or by phone to +44 (0) 207 724 3109
- All enquiries, concerns or requests sent via these channels are picked up and monitored by the Safeguarding team or the Operations department and will be actioned as appropriate. Discretion will be applied at all times

Programme participants and HerVenture users have access to a dedicated WhatsApp number which will be shared at the start of and during the programme, on the app and on our digital training platform.

Where concerns are made in writing by email or post it is helpful to receive as much information as possible, particularly:

- The specific area, programme or activity to which the concern applies
- Your name and contact details: this is essential to allow us to conduct a full investigation of your concerns

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[1] Associated personnel refers to individuals not directly employed by the Foundation but who are engaged in, represent, or deliver Foundation activities. This includes, but is not limited to, consultants, contractors, trustees, volunteers, interns, partners, and any other individuals acting on behalf of the Foundation.

- If the concern has happened in person or online
- An outline of the nature of your concern as precisely as possible, to support us to investigate further. Please include details such as the place and time the incident occurred
- Please let us know if you have already reported the concern, and if any action was taken previously
- Any specific cultural factors or risks that need to be taken into consideration?
- How might this concern affect what the organisation delivers in the short term?
- Who else might need to be informed?
- If known, how the values and behaviours in the Code of Conduct may have been breached?
- What support or actions you would like the Foundation to take and what time timeframe?
- Provide consent for us to discuss this discretely with senior colleagues.

All information will be handled sensitively, telling only those who need to know and following any relevant data protection requirements.

4 Information to be noted by staff receiving a verbal concern

Concerns received by telephone or in person need to be recorded in a consistent way.

The person who receives a concern by phone or in person should:

- listen carefully and stay calm;
- wherever possible, obtain consent to share the information and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. However, there are certain circumstances in which you must report the concern regardless of whether the person making the disclosure consents – these include if the concern relates to the occurrence of a crime or if the safety of children or adults is at risk. If you share information without consent, you must keep a record of what has been shared and with whom;
- write down the facts of the concern;
- take down the individuals contact details;
- note down the nature of relationship the individual has with the Foundation e.g. donor, supporter, volunteer, participant in a Foundation programme, etc.;
- ascertain whether the situation occurred online or in person;
- tell the individual that we have a raising concerns policy and their concern will be investigated as set out in the policy. If possible share the policy;
- tell the individual what will happen next and how long it is likely to take;
- where appropriate, ask the individual to send a written account by email that the concern is recorded in the individuals' own words (if email is not possible postal address may be used);
- find an appropriate and early opportunity to explain that it is likely that the information will be shared with others. Do not promise that you can keep it a secret or that 'in confidence' means that you will not pass it on;
- report the information immediately – to your line manager/Director, or Safeguarding lead; and

- keep the matter confidential, and only ever share information on a need-to-know basis with those assigned to addressing the matter. You must not discuss the matter with anyone else.

5 Confidentiality

Individuals should be encouraged and feel able to voice a concern openly under this policy.

Any concerns raised under this Policy will be treated in a sensitive manner. Details of individuals will only be shared with those who need to know in order to review, investigate, and progress the matter.

If someone wishes to raise a concern confidentially on the basis that their name is not revealed without their consent, this will be respected as far as possible. If an investigation may indicate the source of the information, this will be discussed with the individual before proceeding. If a concern is raised anonymously, this is likely to limit the extent to which the Foundation can investigate the matter and therefore put others at risk. Raising a concern openly makes it easier to investigate fully, provide feedback, and take action.

Individuals who raise a genuine concern in line with this Policy will not suffer any detriment as a result of raising that concern. This includes cases where a review or investigation confirms that there has been no wrongdoing.

6 Investigation of a concern

The Executive Director is responsible to the Board of Trustees for the investigation and management of all concerns. On receipt of a concern:

- all concerns and complaints will be taken seriously, formally logged and responded to as a matter of urgency (usually within 24-48 hours of receipt);
- all concerns and complaints will be treated with the strictest of confidence and only those directly involved will be aware of details on a "need to know" basis;
- all concerns and complaints will be triaged and assessed as to whether or not a full investigation is required. Other actions that can be taken to help address concerns include offering support to the survivor/complainant, awareness raising, and developing new ways of working;
- if necessary, a trained Foundation employee or representative will carry out a safe, and discreet investigation, recognising the rights of and duty of care to everyone involved, including complainant and/or survivor, witnesses and subject of complaint;
- those involved directly with the case will be appropriately informed on how the case is progressing. Timeframes will be explained and adhered to as much as possible;
- a group of senior employees (likely to be members of the Senior Leadership Team, which includes the Executive Director) will discuss and sign off the outcome of concerns investigations to ensure transparency, and accountability;
- the relevant authorities will be informed about serious cases as required;
- the Safeguarding Lead and others involved in case management will ensure that lessons are learnt in the most appropriate way and that these lessons inform future organisational practice; and
- the appropriate support options will be provided to all those involved with the case.

7 Raising concern with external regulator

The Cherie Blair Foundation for Women is a charity registered in England and regulated by the Charity Commission who have their own processes in place to allow individuals to raise concerns about registered charities. Individuals can contact the Charity Commission directly if they feel that the Foundation's work is causing a serious risk of harm to the charity or people it was set up to support.

Examples of serious issues include:

- A charity not following the law, with damaging consequences to its reputation and public trust in charities generally
- Serious harm to the people the charity helps or other people who come into contact with the charity through its work
- A person or organisation receiving significant financial benefit from a charity
- Criminal, illegal or terrorist activity
- A charity set up for illegal or improper purposes
- A charity losing significant amounts of money
- A charity losing significant assets, for example land or buildings

You can raise your concerns here: https://forms.charitycommission.gov.uk/raising-concerns/

The Charity Commission also requires any registered charity to report 'serious incidents' directly to them. The Foundation will report to the Charity Commission any safeguarding concerns that have resulted or could have resulted in harm. This includes some situations where our own policies or procedures have not been followed properly. If those breaches have put people who come into contact with the Foundation through its work at significant risk of harm, we must report them even if no actual harm occurred.

If an incident has occurred involving one of the Foundation's partners in the UK or internationally, which materially affects the Foundation's, staff, operations, finances and/or reputation then this may also need to be reported to the Charity Commission. This includes where the partner is delivering on our behalf, referring mentees to us or receiving funding from us.

The responsibility for reporting serious incidents rests with the Foundation's trustees. In practice, this may be delegated to someone else within the Foundation, such as the Executive Director.

8 Learning

Concerns are reviewed on a regular basis by the Senior Leadership Team and the Board of Trustees of the Foundation so that lessons can be leant. This will include:

- considering any factors that may have contributed to or failed to prevent the incident occurring;
- reviewing safeguarding and other relevant measures to ensure ongoing vigilance; and
- making changes to organisational policies and procedures as necessary.