



HUMAN RIGHTS AT SEA

WHISTLEBLOWING AND COMPLAINTS POLICY

Adopted: Sept 2020

Renewed: October 2025

Policy Statement

Human Rights at Sea (HRAS) CIC is committed to upholding the wellbeing of any member of staff, senior management, Ambassador, non-executive Director, volunteer or beneficiary so they should not in any way be harmed as a result of protected and confidential disclosure, whether the matter reported proves to be true or not, strictly provided that the reporting was carried out in good faith and without any form of malice, whatsoever.

Scope of Policy

The policy applies to all beneficiaries, supporters, employees, volunteers, management, partners, consultants and service suppliers.

Ethics Principles

HRAS's ethics principles: Beneficiaries First, Ethical Culture, Transparent & Accountable, Outward Facing Risk, Due Diligence and Code of Conduct, inform this policy. Please read the HRAS Ethics Policy in conjunction with this Policy.

Standards

- Human Rights at Sea recognises the importance that any fraud, misconduct or wrongdoing by staff or others working on behalf of the HRAS is reported and properly dealt with.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- No employee or other person working on behalf of HRAS will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.
- Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered because of any investigation under this procedure our disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent. You should report the matter.

Roles and Responsibilities

The Founder, President and/or designated senior management has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under



HUMAN RIGHTS AT SEA

our control comply with it.

The management team is responsible to ensure all staff are aware of the policy and the policy is made publicly available to supporters and beneficiaries.

The Founder, President and/or designated senior management or delegated person is responsible to lead on investigations as per the below process.

Staff and contractors

Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of the organisation should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of

- to be vigilant.
- to inform HRAS of any legitimate concerns about any aspect of work of the organisation, including its employees.

Commitments, Controls and Process

Investigation and possible outcomes

An investigation will take place into the alleged matter or practice. This may involve meeting with the member of staff to discuss their concerns. When disclosing any concerns, the member of staff would not be expected to have absolute proof of malpractice or illegal practices but would need to show the sound reasons for their concerns.

Once a protected disclosure has been received it will be referred to the delegated person who will report it to the Founder, President and/or designated senior management, giving details of the protected disclosure, including:

- date and substance of the protected disclosure.
- identity and level of seniority of the alleged wrongdoer(s).
- level of risk associated with the alleged wrongdoing.

The Founder, President and/or designated senior management will decide whether sufficient information exists to allow the allegation(s) to be investigated and, if so, the appropriate process to determine:

- the nature and scope of the investigation.
- the person (internal or external) who will lead the investigation.
- the nature of any technical, financial or legal advice that may be required.
- a timeframe for the investigation paying regard to the level of risk
- whether any individual(s) under investigation should be suspended.

They will also consider the appropriate time to inform any alleged wrongdoer(s) of the investigation process. HRAS will also aim to keep the member of staff who raised the concern informed of the progress of any investigation and its likely timescale. However, sometimes the need for confidentiality may prevent the HRAS giving specific details of the investigation or any disciplinary action taken as a result. Staff should treat any information about the investigation as confidential.



HUMAN RIGHTS AT SEA

Confidentiality

All concerns will be treated in confidence, and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action because of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support. All personal data collected is subject to GDPR and must follow the GDPR policy.

Raising a whistleblowing concern

If a member of staff believes that a matter or practice within the scope of this policy is or has been taking place, they should make the disclosure immediately to their line manager.

If the matter or practice is more serious and/or concerns the line manager, or if the staff member does not feel comfortable reporting to their line manager, then it should be reported to the Founder, President and/or designated senior management.

Founder, President

E: david.hammond@humanrightsatsea.org

Please make it clear that you are making your disclosure within the terms of the firm's whistleblowing policy. This will ensure the recipient of the disclosure realises this and takes the necessary action to investigate the disclosure and to protect the whistleblower's identity. We will then get in touch with you to discuss your concern. We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result.

Concerns can be raised by telephone, in person or in writing. They should include the background and history of the concern, including relevant dates, and the reason why the situation gives particular cause for concern. Although employees are not expected to prove beyond doubt the truth of an allegation, they will need to demonstrate to the person contacted that there are reasonable grounds for concern.

Concerns should be raised as early as possible, as this will make it easier to take action and enable any problems to be resolved quickly.

However, it is recognised that some bad practices can develop over a long period of time, delaying the opportunity for disclosure, or could be discovered after they have become well-established. There is no definite time limit on raising concerns. Whether an issue can viably be dealt with after a long period of time will depend on the circumstances.



HUMAN RIGHTS AT SEA

Anonymous Disclosure

You can report your concerns anonymously; however, this policy encourages staff to put your name to any allegation they make. If you report concerns anonymously it might:

- make it more difficult for us to investigate your concern.
- be harder to argue that any unfair treatment at work was as a result of blowing the whistle, because we do not have a record of you.
- be harder for us to conduct an investigation in a way that could protect you from being identified.

Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Board of Trustees. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

Untrue Allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the Organisation will recognise your concern, and you have nothing to fear. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include administrative disciplinary action, may be taken. If you disclose your concerns to a regulator, please note that it is a criminal offence to knowingly or recklessly provide false or misleading information to The Organisation Commission. In the case of a deliberately untrue and/or malicious action, the Organisation reserves its right to seek all relevant and applicable legal actions and measures of relief as against the complainant.

Where can I get independent advice

Individuals can contact the independent whistleblowing organisation PROTECT for free, independent and confidential advice, for example to find out what is protected by PIDA and how best to raise concerns. The organisation runs an advice line on 020 3117 2520 for whistleblowing advice. Their website is www.pcaw.co.uk.

External disclosures

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. Staffs should only approach an external prescribed person or body, for example, the Organisation Commission for England and Wales, if they believe their concern was not taken seriously or the wrongdoing is continuing. The contact details are as below,

Organisation Commission

E: whistleblowing@organisationcommission.gov.uk



HUMAN RIGHTS AT SEA

Definitions

Whistleblowing

'Whistleblowing' is a term used to refer to the disclosure of information which relates to suspected wrongdoing (generally a breach of a legal, statutory or regulatory requirement or unethical, immoral behaviour). This may include:

- Breach of a legal requirement - e.g. health and safety obligations owed by the Organisation and/or an individual
- General malpractice such as immoral, illegal or unethical conduct
- Gross misconduct
- Breach of audit (or other applicable) regulations
- Breach of the codes of conduct of all relevant professional institutions

Protected Disclosure

An individual making a "protected disclosure" is given statutory protection from victimisation under the Public Interest Disclosure Act 1998 (PIDA), provided the disclosure is in the public interest.

A "protected disclosure" is any disclosure of information which, in the reasonable belief of the individual making the disclosure, tends to show that one or more of the following has been committed, is being committed or is likely to be committed. The disclosure must be made in accordance with certain conditions, and these conditions are less onerous if the disclosure is made internally:

- a criminal offence.
- a failure to comply with any legal obligation.
- a miscarriage of justice.
- racial, sexual, disability or other discrimination.
- a danger to the health and safety of any individual.
- damage to the environment.
- possible fraud and corruption.
- neglect or abuse of clients, or
- other unethical conduct or
- deliberate concealment of information relating to any of the above.

It is immaterial whether the information is confidential and whether the incident occurred, occurs or would occur in the UK, or elsewhere and whether the law applying to it is that of the UK or of any other country or territory. A legal obligation can include a contractual or other civil obligation as well as an obligation under criminal law. You should seek advice if unsure on any of the points. (See 'Where can I get independent advice?').

ENDS.