



Incident Reporting & Management Policy

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1. Introduction

Welcome to Working for Wildlife (W4W). We are extremely proud of our company and the team we have assembled to service and promote our business. It is fully understood and accepted that our staff are a most valuable asset and the key means by which we can achieve our goals of growth, profitability and ongoing success.

In order for us to continue providing our customers with the highest quality standards of service and best value for money, it is essential that we all share a common philosophy in the way we approach and perform our individual and collective duties and responsibilities. Each of us has an important part to play and all of us are reliant upon one another making a full contribution towards generating a harmonious and efficient working environment. We set out in this handbook the policies and procedures by which we have attained our present status and with which we will pursue our commitment to maximise and develop the potential of all our staff whilst maintaining lasting and mutually beneficial working relationships.

Unless otherwise stated, our use of the term “staff” shall be deemed to include all others who represent Working for Wildlife either as employees, directors, contractors, sub-contractors or other third-parties or suppliers and unless otherwise stated all conditions of this policy shall apply to employees and non-employees representing the company. “Workplace” in the context of Working for Wildlife refers to any private site, event or building that a Working for Wildlife staff member uses to conduct their work.

We sincerely hope that you will enjoy a long and fruitful career or commercial engagement with us. Please read this policy carefully and address any queries that you might have to your line manager or Working for Wildlife administration.

1.1 About Working for Wildlife

Working for Wildlife, a leading UK independent, specialist fundraising agency, is a member of the Institute of Fundraising (IoF), was a member of the Fundraising Standards Board (FRSB) prior to its replacement in 2016 by the new Fundraising Regulator (FR) and complies in all respects with the Code of Fundraising Practice and the associated Rule Books controlled and issued by FR and monitored for Compliance by the IoF.

Working for Wildlife's directors, staff, management team and many of our fundraisers started fundraising and membership recruitment in the early 1990s initially for the Wildlife Trusts network in the South West and eventually throughout the UK and Northern Ireland from where the business expanded further, primarily within the environmental and conservation charity sector fundraising for other charities such as The RSPB, The Woodland Trust, WWF (UK), The Wildfowl and Wetland Trust, Friends of the Earth, The Ramblers Association, Soil Association amongst others. In addition, W4W have represented a number of non-conservation related charities. Working for Wildlife Limited was formed in late 2012 to initially support and represent the RSPB and the Woodland Trust. The company now also represents WWF UK and Greenpeace UK.

2. Policy Aims

This policy aims to set out clearly the expectations of W4W, and to ensure that all staff understand what an incident is and who might report one, the steps Working for Wildlife will take after an incident and the possible outcomes after an investigation.

3. What is an Incident?

For Working for Wildlife, an incident includes - but is not limited to - any mystery shops conducted on fundraisers, any complaints made against any of our staff members, and any commendations made about our staff or general conduct.

3.1 Who Might Report an Incident

Incidents can be reported from any number of sources but most commonly they will come from mystery shops (IoF or Woodland Trust), from venue and event staff/organisers, or from the general public. On occasion, a member of staff will want to report an incident involving the organisation or another member of staff. How these disclosures should be reported and dealt with is covered in Section 7 of this document.

4. Mystery Shopping Incidents

All incidents of mystery shopping undertaken on a Working for Wildlife staff member, regardless of whether it is undertaken by the Institute of Fundraising or the Woodland Trust, are immediately accessible from the office. These electronic reports explain when and where the mystery shop took place and which fundraiser was working, as well as specifics about the conversation that took place. Scores are given dependent upon whether the finer details of signing up to donation and membership have been adequately explained and recruiters are marked accordingly. Fundraisers who achieve a score of 100% in a mystery shopping incident will be awarded by Working for Wildlife with a monetary bonus of £15. However, if fundraisers are mystery shopped by the IoF and are found to be in breach of any of the rules in the Fundraising Regulator's Private Site Fundraising Rulebook they will incur penalty points which have an equivalent monetary value of £1 per point accrued. Working for Wildlife withholds the right to pass these fines on to any fundraiser who is found to be in breach of any of the rules within the FR Rulebook.

Upon receiving a mystery shopping report, the office will pass the details on to the relevant Area Coordinator (AC) to feed back to the fundraiser in question. It is the AC's responsibility to decide if further steps are to be taken - no further action is required by Working for Wildlife at this stage unless the charity has raised an issue. In that case, a response would be made directly to the charity to let them know what has resulted from the report.

5. Complaints

As a member of the Institute of Fundraising (IoF) and supporter of the Fundraising Regulator (FR), W4W have committed to following the Code of Fundraising Practice and to be compliant with the related Rule Books associated with each type of fundraising W4W undertakes. The standards set within the Code and Rule Books outline the behaviour that is expected of fundraisers and form the basis upon which the FR can investigate and adjudicate complaints about fundraising practice.

The Fundraising Regulator's Code of Fundraising Practice states in the Key Principles and Behaviours (Section 1.6: Complaints and Concerns):

- Organisations **MUST** have a complaints procedure which **MUST** apply to any Third Parties fundraising on their behalf;
- Organisations **MUST** respond to any complaints from donors, beneficiaries or other parties in a timely, respectful, open and honest way;
- Organisations **MUST** ensure that learnings from any complaints are acted upon.

A complaint is a statement that something is unsatisfactory or unacceptable. Most commonly, these are passed on to Working for Wildlife directly from the charity after a complaint has been made to them, but on occasion Working for Wildlife may receive a complaint directly from a member of the public or from venue and event staff/organisers.

All complaints about a specific recruiter are passed on to the relevant AC and it is their responsibility to investigate further and decide what further action (if any) needs to be taken. The seriousness of the allegations and what occurred during the incident will affect the

required turnaround time and what action is taken. This could include (but is not limited to) further training or disciplinary action (verbal warning, written warning, or contract termination). Complaints received directly from the charity that are deemed to be serious require a response within 8 working hours, so if the AC cannot be contacted, Working for Wildlife will step in to ensure that the charity gets an answer in the agreed timeframe. For minor complaints, Working for Wildlife endeavour to respond within 48 hours where possible.

If a complaint is made to Working for Wildlife about the company's conduct and general fundraising standards, they will endeavour to address the concerns that are raised directly. However, if the individual does not feel that this was dealt with in a satisfactory manner, the issue must be taken to the Institute of Fundraising who will follow their own disciplinary procedures to investigate the complaint and allegations that have been made.

All complaints made - whether about a specific fundraiser or about the organisation - will be investigated and appropriate action will be taken to try to resolve the issue or to ensure that it does not occur again. The party who made the complaint will be responded to in a timely manner, to ensure that they are made aware of the outcome of their complaint.

6. Commendations

Not all incidents that occur are negative and it is not uncommon for us receive praise or recognition for our excellent work at a venue or show. This feedback is often originally given to the Event Coordinators (ECs) when they contact a venue or show organiser to make bookings, although it is occasionally passed on to the office via email or letter. All commendations that W4W receive for individual recruiters are forwarded on to their AC to pass on their compliments.

7. Disclosure (Whistleblowing) Policy

The Fundraising Regulator's Code of Fundraising Practice states in the Key Principles and Behaviours (Section 1.6: Complaints and Concerns) that fundraising organisations must have a clear and published internal procedure for members of staff and volunteers to report any concerns they may have regarding their organisation's fundraising practice. This could be either a standalone policy or part of a wider whistleblowing policy made available to staff and volunteers. In either case, the policy **MUST** include:

- The type of issues that can be raised and the process for doing so;
- How the person raising a concern will be protected from victimisation and harassment;
- How and what the organisation will do in response to receiving such information; and
- How an individual can escalate their concerns on fundraising practice to the Fundraising Regulator or the Independent Fundraising Standards and Adjudication Panel for Scotland in the event that internal consideration is not possible.

The Public Interest Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by their employers because of publicly disclosing certain serious concerns.

It is often members of staff who are the first to know if someone in the organisation appears to be acting illegally or improperly. They may feel apprehensive or anxious about raising their concerns, and their loyalty to the company or to a colleague may prevent them from coming forward. They might also be concerned that they will not be taken seriously or that making a disclosure might provoke action against themselves. However, individuals who have knowledge or reasonable suspicion of wrongdoing are encouraged to come forward without fear of reprisal. Working for Wildlife takes all wrongdoing seriously and any evidence or allegations suggesting such behaviour will be investigated thoroughly and with absolute confidentiality. The purpose of this policy is to assist and enable all members of staff to raise concerns or to disclose information which they believe, in good faith, may indicate malpractice. Individuals are encouraged and expected to use this procedure rather than to air their grievances outside of the organisation. There are possible consequences of not following this procedure, which are set out below.

7.1 Scope of the Policy and Procedure

This policy is concerned with alleged malpractice, impropriety or wrongdoing in the organisation which is in Working for Wildlife's or public interest to disclose. This might include, but is not limited to:

- Financial malpractice or impropriety or fraud;
- Failure to comply with a legal obligation or with the rules and regulations established by the Fundraising Regulator and/or Institute of Fundraising;
- Dangers to health and safety or the environment;
- Criminal activity;
- Improper conduct or unethical behaviour including any offence under the Bribery Act 2010;
- Miscarriage of justice;
- Attempts to conceal any of above.

It can be difficult to decide whether an incident falls within the disclosure policy and it may be that, when concerns are investigated, it appears appropriate to address them through other means or more specific policies. For instance, to be reviewed and investigated as a complaint or dealt with via the Grievance Policy or Disciplinary Policy. In such cases the matter will not normally be covered by the Public Interest Disclosure Act procedures.

7.2 Procedure for Making & Investigating a Disclosure

1. As a first point of contact concerns should normally be expressed in writing to Harley Hannan-Mattock (incidents@working4wildlife.org) at the Working for Wildlife office in Plymouth, who is designated as the person primarily responsible for overseeing this procedure. If, however, an allegation directly concerns Harley, or his involvement would not be appropriate for any other significant reason, then the allegation may be sent in writing to Diana Thompson (diana@working4wildlife.org), who may in turn, refer the matter to the Managing Director or the Institute of Fundraising (whoever is most appropriate).

2. On receipt of an allegation the person to whom the disclosure was made (or referred) will consider the information disclosed and decide whether the matter falls within the scope of this policy, and if so, whether there are grounds for proceeding with an investigation.
 - i. If the matter falls outside of this procedure but within another, then the individual making the disclosure will be informed and directed to the appropriate policy and process.
 - ii. If it is decided that there are insufficient grounds on which to proceed the individual making the disclosure will be informed and will be given the chance to provide further information and resubmit their concerns.
 - iii. If there are grounds for proceeding, the person to whom the disclosure was made (or referred) will decide how the investigation should be undertaken. This will depend on the nature of the allegation, but may involve:
 - a. An internal investigation conducted by an independent member of our compliance team;
 - b. Referring the matter to the Institute of Fundraising or the Fundraising Regulator;
 - c. Referring the matter to the police;
 - d. An independent external enquiry.
3. An investigation will not be conducted by any person who may have to make a significant decision arising from the findings. It will be conducted as sensitively as possible and normally be complete within eight weeks of the disclosure being made. The investigation will also consider concepts of natural justice and the need to safeguard individual reputations.

When an allegation concerns a named individual, the person concerned will be informed of the allegation and of the evidence supporting it. He/she will be invited to respond to the allegation as part of the investigation and/or before any final conclusion is reached. The point at which it is appropriate for the individual to be informed will depend on the nature of the case.

4. The findings of any investigation will be reported to the original person to whom the disclosure was made (or referred) who will reach a decision on any further action to be taken.

Following an initial investigation, other internal policies may be identified as more relevant to the case and may be invoked, such as the complaints procedure, or the grievance or disciplinary policies. In some cases, it may be appropriate to refer a matter outside the organisation for further investigation.

The individual to whom the disclosure was made (or referred) will inform the person making the allegation of the conclusion reached and what action, if any, is to be taken and why.

5. If the individual making the disclosure is dissatisfied about how an inquiry was carried out and its resultant outcome then he/she may appeal to the Managing Director who may order the case to be reviewed.

If the disclosure relates to fundraising practice and the individual who made the allegation wants to escalate their concerns further after initial investigation by Working for Wildlife they are advised to contact the Fundraising Regulator directly by telephone (0300 999 3407) or via their website: <https://www.fundraisingregulator.org.uk/make-a-complaint/complain-about-a-fundraising-approach/>

6. A report summarising all disclosures and inquiries plus any subsequent action that was taken will be made by the person to whom the disclosure was made (or referred) and will be retained for a minimum of three years.

7.3 Safeguards

Working for Wildlife is keen to ensure that the position of both the individual raising concerns and anyone about whom allegations might be made are safeguarded. It will do this through the following measures:

7.3.1 Protection

The policy offers protection against dismissal or other penalty by Working for Wildlife to those individuals who disclose any relevant concerns provided that the disclosure is made in good faith, in the reasonable belief that what is disclosed may help identify malpractice and to the appropriate person.

Furthermore, if someone tries to discourage an individual from coming forward to express a concern, W4W will treat this as a serious disciplinary offence. In the same way, anyone who criticises or victimises the individual after a concern has been expressed will be dealt with under the disciplinary process.

7.3.2 Confidentiality

Working for Wildlife will aim to treat all disclosures and information regarding any action taken under these procedures in a confidential and sensitive manner, in particular:

- i. Individual making a disclosure**

The identity of the individual making an allegation will remain confidential unless otherwise agreed with that individual, as long as it does not hinder or frustrate the investigation and is compatible with natural justice. However, the investigation process

may at some stage need to reveal the source of the information and the individual making the disclosure may at that stage need to provide an attributable statement as part of the evidence to be presented.

ii. Named individual

During the course of any investigation Working for Wildlife will, as far as is reasonably possible without prejudicing that investigation, endeavour to maintain confidentiality regarding the names of any person/people named in an allegation.

7.3.3 Anonymous Allegations

Individuals are normally expected to put their name to any disclosures or allegations that they make and concerns expressed anonymously will not normally be addressed. However, at its discretion, Working for Wildlife may decide to do so after taking into account the seriousness of the issues raised, the credibility of any allegations and the likelihood of being able to substantiate the allegation through attributable sources.

7.3.4 Unsubstantiated Allegations

No action will be taken against an individual who makes an allegation in good faith even if it is not confirmed by subsequent investigation. If however, an individual makes what are subsequently determined to be malicious or vexatious allegations or made for personal gain, and particularly if he or she persists in making them, disciplinary action may be taken. A disclosure may be deemed malicious or vexatious at any stage of the procedure.

7.4 Disclosure Summary

The disclosure policy is designed to clarify the route through which concerns can be raised and to assure the individual that such matters will be taken seriously and will be acted upon. Working for Wildlife takes the view that in most cases an internal investigation and decision is likely to be the most appropriate action.

If an individual raises matters of concern outside of the organisation without first using this procedure he/she may be in breach of the disclosure policy. Such circumstances could be deemed to be a potential disciplinary offence especially if it causes or might have caused unnecessary reputational damage to a member of staff or to the organisation. In such circumstances, disciplinary action may be taken.

8. Summary

In incidents of mystery shopping, complaints or commendations the AC of the staff member involved, will normally be the first person who is informed after Working for Wildlife is notified. It is then the ACs responsibility to investigate further and decide if further action is necessary and what course of action is to be taken.

In the rare incidence that an individual feels the need to make a disclosure about Working for Wildlife or a member of the organisation they are required to follow the procedures outlined in the Disclosure (or Whistleblowing) Policy in section 7 of this policy. It is hoped that no member of staff should ever feel the need to make a disclosure, however, any disclosures that are made will be taken extremely seriously and dealt with in the strictest of confidence. Any individual who discloses information in good faith can do so without fear of action being taken against themselves.

Working for Wildlife acknowledges that incidents, both positive and negative, are going to occur, however a thorough understanding and practice of the Institute of Fundraising's and the Fundraising Regulator's Code of Practice and Rulebooks should help to ensure more positive incidents take place. If you have any questions or queries regarding our incident reporting and management policy please contact Craig Steele on 01752 296064 who will be able to talk through any issues you have.