



Whistleblowing Policy and Process

1. Purpose

This policy establishes a clear, safe, and independent process for anyone associated with the Foundation to raise concerns about wrongdoing or serious risk in good faith, without fear of retaliation. It sits alongside and does not replace the Foundation's Anti-Corruption Policy, Safeguarding Policy, and Complaints Policy. Where a concern falls under more than one policy, this policy governs the reporting and protection process; the relevant substantive policy governs the investigation.

2. Scope

This policy applies to all staff, trustees, volunteers, interns, consultants, contractors, and partners. It also extends to former employees raising concerns about matters that occurred during their employment.

3. What is a Whistleblowing Concern?

A whistleblowing concern is a disclosure made in the public interest about conduct that the person raising it reasonably believes involves one or more of the following, within the framework of the A.M. Qattan Foundation:

- A criminal offence, including fraud, bribery, or corruption
- Failure to comply with a legal obligation
- A miscarriage of justice
- Endangerment of health or safety
- Damage to the environment/ properties
- Deliberate concealment of any of the above
- Serious misuse of Foundation funds or resources
- Abuse, sexual harassment, or exploitation
- A serious breach of the Foundation's policies

A whistleblowing concern is distinct from a personal grievance about an individual's own employment or treatment, which is handled under the HR Manual. Where a concern involves elements of both, the Foundation will address each strand appropriately.

4. Legal Framework

As a UK-registered charity, the Foundation is bound by the [Public Interest Disclosure Act 1998 \(PIDA\)](#), which provides legal protection to workers who make qualifying disclosures. This policy reflects PIDA

requirements and extends equivalent protections to all individuals within scope, including those not covered by PIDA as a matter of law.

5. Reporting Concerns

We hope that all individuals covered by this policy feel confident in raising concerns to their AMQF point of contact in the first instance.

If you feel unable to do so, you may raise your concerns in one of the following ways:

Via the AMQF Complaints/ Feedback mechanism	feedback@qattanfoundation.org telephone: +970 2 296 0544 Online form: https://qattanfoundation.org/en/feedback Noting these routes initially to management and are more appropriate when the concern does not involve senior leadership
Via the Nominated Whistleblowing Trustee	Chair of the Board of Trustees whistleblowing@qattanfoundation.org

Where the concern involves the Chair of the Board of Trustees, the person raising the concern should contact another trustee directly or may report externally to the UK Charity Commission.

Concerns may be raised anonymously. Anonymous reports will be investigated to the extent possible given the information available.

Individuals with legitimate concerns are encouraged, as far as possible, to raise them in line with the internal reporting routes laid out in this policy. If a concern relates to any serious wrongdoing at AMQF, and if you do not have confidence in AMQF's response, this may also be reported to the relevant agency following the [Government Guidance](#) in the UK, or relevant agencies in other jurisdictions.

6. Protection for the Person Raising a Concern

The Foundation guarantees that anyone raising a concern in good faith under this policy will not face retaliation, dismissal, demotion, harassment, or any other detriment as a result. This protection applies regardless of whether the concern is subsequently substantiated, provided it was raised honestly and not maliciously.

Any member of staff who retaliates against a whistleblower will be subject to disciplinary action, up to and including dismissal.

If the person raising a concern believes they have suffered retaliation, they should report this to the Whistleblowing Officer or, if the concern involves the Whistleblowing Officer, to another trustee.

7. Confidentiality

The Foundation will protect the identity of the person raising a concern to the fullest extent possible. However, where the nature of the investigation requires disclosure — for example in legal proceedings — this may not be possible. In such cases, the individual will be informed in advance wherever practicable.

8. Process and Timeframes

Step	Action	Timeframe
Receipt	Officer acknowledges receipt of the concern	Within 5 working days
Assessment	Officer assesses severity and assigns investigation lead	Within 10 working days of receipt
Investigation	Investigation conducted — internally or externally depending on severity and who is implicated	Proportionate to complexity; reporter updated at least every 30 days
Outcome	Findings and recommended actions reported to BoT; reporter informed of outcome to the extent confidentiality allows	Within 60 working days where possible
Close-out	BoT confirms actions taken; record maintained	Following outcome report

Where the concern involves the DG, the Board of Trustees leads the investigation directly or appoints an external investigator. The DG is not informed of the concern until the Whistleblowing Officer determines it is appropriate to do so.

9. Record Keeping

The Whistleblowing Officer maintains a confidential log of all concerns raised under this policy, including date received, nature of concern, investigation lead, outcome, and actions taken. This log is reviewed by the Board at least annually. Aggregate, anonymised data on concerns raised is reported in the Foundation's annual governance review.

10. Malicious or Vexatious Reports

This policy is not intended to be used to raise concerns that are knowingly false or made in bad faith. A person who makes a malicious or vexatious report may be subject to disciplinary action. This provision does not affect the protection afforded to good faith reports that prove unfounded on investigation.

11. Relationship to Other Policies

Type of concern	Primary policy
Corruption, fraud, bribery	Corruption Policy — with this policy governing protection and escalation
Abuse, harassment, exploitation	Safeguarding Policy — with this policy governing protection and escalation
External complaint about services	Complaints Policy
Personal employment grievance	HR Manual
Concern involving the DG or BoT	This policy exclusively