

TRAFFIC'S WHISTLEBLOWING POLICY

BACKGROUND

TRAFFIC International is registered as a company limited by guarantee and a registered charity in England and Wales and is subject to laws, regulations and guidance for the operation of charitable companies. The Board of Trustees, formed under the Articles of Association, is TRAFFIC's primary governing body. The registered office of TRAFFIC International is located in Cambridge, UK.

TRAFFIC's worldwide leadership, coordination, multi-regional and corporate functions are managed through a Global Office, with staff based at the head office in Cambridge and out-posted at strategic locations worldwide. The Executive Director takes direct responsibility for management oversight of the Global Office. TRAFFIC's local engagement is managed through Programme Offices with staff based in a hub office and at other strategic locations where necessary. Programme offices are established as locally registered branches of the TRAFFIC International charity or through hosting agreements with a third-party organisation, often an office or WWF or IUCN.

The Guidelines for the Operation of TRAFFIC: A Staff Handbook, or the 'TRAFFIC Guidelines,' explain the expectations for performance and behaviour of members of the TRAFFIC team worldwide and establish a range of common approaches and processes aimed to ensure effective co-operation and co-ordination among TRAFFIC staff and offices. All staff members working under a TRAFFIC mandate must act in accordance with these Guidelines and any other contractual conditions or instructions particularly local hosting agreements.

Staff members have the obligation to protect and promote the organisation's interests, avoiding or declaring conflicts of interest should they arise, and acting with due respect for other people. This obligation includes refraining from infringing the physical and mental health, safety, privacy and human rights of others; refraining from any kind of coercion or harassment; and adopting practices that enhance human value and development in the workplace.

POLICY

TRAFFIC International is committed to the highest standards of performance, conduct and openness.

Section 10.3.5 of the TRAFFIC Guidelines states the organisation's overarching policy statement:

TRAFFIC is committed to protecting against retaliation those staff members who report what they reasonably and in good faith believe to be ethical misconduct in accordance with this or any other TRAFFIC policy.

This policy describes the process for the disclosure of wrongdoings that are in the public interest and misconduct that is illegal, unethical or against the organisations ethos as detailed in TRAFFIC's codes of conduct.

In addition, as a UK-based organisation, TRAFFIC International is subject to the UK's Public Interest Disclosure Act 1998 (PIDA) which is designed to protect staff and other workers who disclose genuine concerns, which seem to involve unlawful conduct or financial malpractice, from victimisation. If staff members are concerned about possible financial irregularity, failure to comply with legal obligations, concealing evidence, or a compliance issue, it can be difficult to know what to do even in the best-run organisation.

The Public Interest Disclosure Act (PIDA) provides guidance for dealing with whistle-blowing issues in a safe and constructive way and encourages staff to raise concerns internally in the first instance.

IMPLEMENTING PROCEDURES

TRAFFIC hopes that staff will feel able to raise any concerns internally, confident that they will be dealt with properly, and with full confidentiality maintained. A full investigation will follow, and any necessary action will be taken by management as quickly as possible.

While TRAFFIC hopes that issues leading to 'whistle-blowing' action will not arise, the organisation is committed to resolving any that do occur as soon as they are identified through an internal or, if necessary, external process. The following steps should be taken by staff:

- Report the concern to your line manager. The line manager will listen to the concern and report the details to the Senior Director – Operations so that the concern can be formally investigated by the organisation.
- If a staff member feels unable to raise a concern with his/her line manager, they should contact HR staff in the UK. The staff member can request confidentiality and every effort will be made to protect the staff members identity. The concern will then be anonymously

reported to the Senior Director – Operations so that the concern can be formally investigated by the organisation.

- For staff who report directly to the Executive Director, any 'whistle-blowing' concerns may be communicated to the Chair of the Operations Committee or to the Chair of the TRAFFIC Board of Trustees.
- If concerns are related to or involve a hosting organisation (e.g WWF or IUCN) the involvement of those organisations may be necessary as part of the investigation and local labour law/hosting policies may influence the process followed.
- If concerns are solely related to a hosting organisation, the whistle-blowing policy of that organisation should be followed. Details can be found for WWF in "Speak up! Policy on Whistleblowing and Escalation of Issues" and for IUCN in its "Code of Conduct and Professional Ethics". For other hosts, please see the local staff handbook.
- The outcome of investigations may not be fully communicated to the original whistle-blower as the confidentiality and protection of staff is a priority.
- If you are unsatisfied with how the organisation has dealt with your concerns you can seek external advice from organisations such as ACAS (<http://www.acas.org.uk>)

For free confidential advice from an external source, staff can contact the independent UK charity

Public Concern at +44 (0)20 7404 6609.

ADDITIONAL REFERENCES

Several documents reference protection for whistle-blowers depending on the nature of the concern. Primary references are as follows:

- Guidelines for the Operation of the TRAFFIC Network (2018) – includes reference to working values, equal opportunity, grievance procedures, whistle-blowing and obligations of consultants;
- Conditions of Service in the UK (2016) – includes policies and procedures on harassment and/or intimidation, whistle-blowing, grievance and disciplinary procedures and gross misconduct;
- Code of Conduct and Professional Ethics (2013) – includes references to standards of conduct, including integrity, accountability, harassment, and protection against retaliation;
- TRAFFIC Anti-Bribery Policy (2016) – includes several references to whistle-blowing procedures;
- TRAFFIC IT Policy (2017) – which covers prohibited and inappropriate content and notes that harassment via email constitutes abuse.