

A close-up photograph of a metal whistle hanging from a chain. The whistle is cylindrical with a flared top and a rectangular base. The background is a solid yellow color.

REPORT ON 'CREATING A SAFE SPACE FOR WHISTLEBLOWERS: HOW TO BUILD SPEAK-UP CULTURES'

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1. INTRODUCTION

In December 2021, the CHS Alliance produced a comprehensive [Whistleblower Protection Guidance](#) supporting the establishment of a strong whistleblowing policy that in turn helps to foster a speak-up culture in organisations. As the Guidance notes: *'All employees, whatever their position, background or identity characteristics, must have the confidence to use the system to speak up.'*

The Guidance also recommends that, *'A good measure of the safety of your policy is to assess whether those with the least power or voice in your organisation feel safe enough to use it.'*

Establishing a whistleblowing policy is the foundation for enabling those willing to, to report wrongdoing or misconduct in the workplace. Nevertheless, the Alliance wanted to go further by exploring issues that may encourage or deter staff from speaking up or reporting misconduct. This was done through a research project focusing on *'Creating a safe space for whistleblowers: how to build speak-up cultures.'*

2. RESEARCH PROJECT OVERVIEW

This project was not designed as formal academic research but as a process to get a field-based perspective on how the aid sector is doing with regards to whistleblowing, how staff feel about it and what needs to be done to improve existing policies and practice.

The project is based on three main elements:

1

an assessment of Alliance members to ascertain how many have a whistleblowing policy in place and how to reinforce it;

2

a series of conversations with staff from non-governmental organisations (NGOs) and UN agencies. Conversations were held bilaterally and in groups with 22 humanitarian staff based in western European countries and Sudan, Tanzania, Uganda, Jordan, Iraq, Australia, and India. Interviewees came from various technical backgrounds including support services, programming, safeguarding, and HR. Some of the interviewed staff were either former or current whistleblowers, and their identity was protected during the project;

3

a [webinar](#) on speak-up culture on 30 March 2022, attended by nearly 100 people from across the sector to share some key recommendations and seek their views on what constitutes the basis of a safe speak-up culture.

3. KEY FINDINGS

3.1. IMPORTANCE OF HAVING A SOLID WHISTLEBLOWING POLICY

Everyone we spoke with acknowledged that it was very important for organisations to have a formal, well-publicised whistleblowing policy in place. Some organisations appeared to be in continuous revision of their policies, particularly large complex organisations.

However, there was concern that the policy was often not communicated well or insufficiently understood. Most interviewees confirmed that they were introduced to the policy during their induction/onboarding session but that there were rarely any reminders or refresher trainings implemented.

The survey was sent to Alliance members. 34 members responded, among which 27 confirmed they had a whistleblowing policy in place, while seven still did not. The process to receive responses from all members is ongoing.

“Written policy is important to show that there are pathways for speaking up and a record of rights and obligations.”

3.2. OTHER FACTORS THAT ENCOURAGE SPEAKING UP

Some interviewees described several good practices they experienced in the sector:

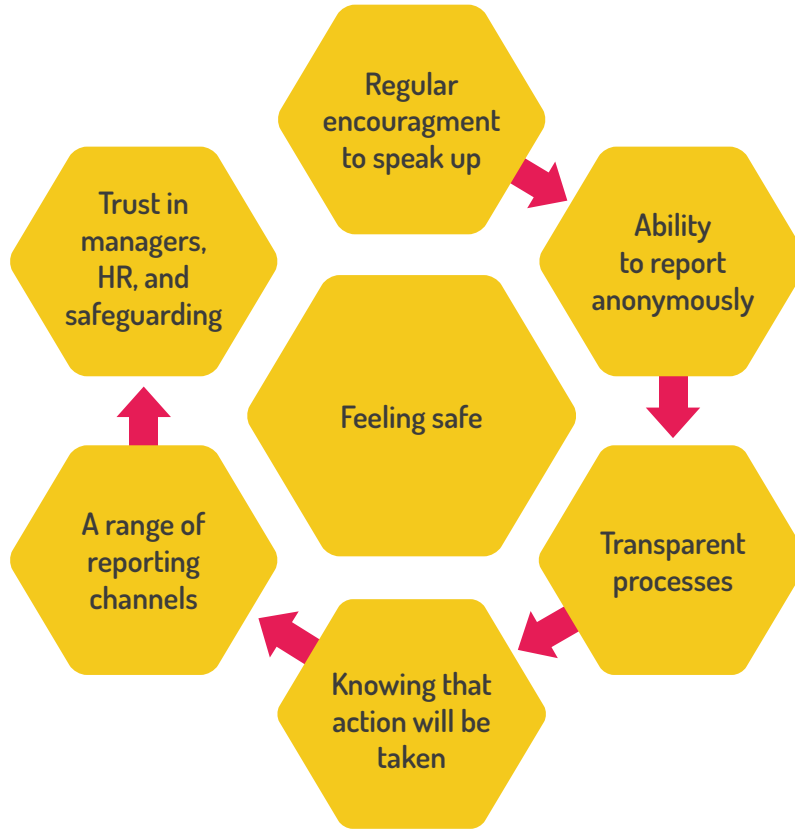
- a general sense that the necessary whistleblowing mechanisms are in place in their organisation;
- proactive encouragement to speak up in some organisations, with regular reminders and training for those directly receiving reports or complaints;
- regular sessions held by Human Resources (HR) about whistleblowing with reminders about the existing policy;
- several whistleblowing issues/reports being dealt with by local teams and resolved at a local level;
- a tendency to have more staff speaking up when staff from headquarters engage effectively;
- a positive experience of whistleblowing with follow-up actions taken to protect the whistleblowers shared with staff, which helped to build trust, encouraging staff to report;
- third party platforms being used by several organisations, with reports being managed and investigated centrally;
- the option of anonymous reporting, which encourages reporting misconduct.

Overwhelmingly, interviewees confirmed that what helped them and others to speak up were if they felt sufficiently safe and had certainty that they would be protected at all stages of the process (e.g., regular reassurance by the organisation that their jobs would be safe and possible promotions not jeopardised by the whistleblowing case).

Other elements mentioned that fostered a strong level of trust and contributed to people speaking up were clear and prompt processes, together with active listening skills from the organisation, regular communications, and a high level of confidentiality.

“When I see that senior managers seek my views on organisational related issues, I feel they would be open to hear me if I was to speak up about misconduct.”

Interviewees highlighted several other conditions which must be met for them to feel able to speak up:



In addition, it was acknowledged that the ability to speak up was also impacted by other factors such as the individual’s race or ethnicity, their gender, their position in the hierarchical rank, their geographical location, and their working relationships with senior managers.

3.3. BARRIERS TO SPEAKING UP

All interviewees acknowledged the importance of speaking up to report harmful behaviours or misconduct, to tackle injustice and to protect against future wrongdoing. However, several interviewees clearly stated that staff would speak up only if the risks of not speaking up outweighed the perceived risks of reporting misconduct.

Overall, the key issues raised by interviewees that seemed to inhibit people from reporting were lack of confidentiality, complex and lengthy processes particularly in large organisations (with late or non-existent feedback), as well as an overall lack of trust in the organisation to listen and act. Specifically, some of the issues raised were:

- Some interviewees who worked in large organisations feared that colleagues would get to know details of the case (e.g. identity of the reporter, etc.), with the lack of confidentiality or anonymity being seen as a serious risk to the individual’s professional reputation as well personal safety in smaller communities.
- Working in a culture where speaking up against seniors or leaders is seen as disrespectful was another issue mentioned, preventing local staff in particular from speaking up. Some other cultures encouraged a focus on unity and harmony rather than speaking up and reporting.

“If staff are not listened to regularly within their organisation, then they feel demotivated or disengaged at work, which makes it unlikely that they will report future misconduct.”

- The most junior staff highlighted their difficulty in reporting, as they do not have clout or power within organisations and are afraid to cause trouble or be seen as troublemakers.
- The interviewees said that in some teams and small organisations, it was likely that the subject of complaint would work closely alongside the person raising the concern. They spoke of the challenge in managing such situations to prevent possible retaliations or reprisals.
- Many interviewees described that they had heard the way others had been treated in the past after reporting misconduct, which contributed to discouraging them from speaking up.
- Other barriers to speaking up acknowledged by all the interviewees include fear for the whistleblower's well-being as well the well-being of others, including dependents and local communities.



Figure 1: The pros and cons of whistleblowing as perceived by interviewees.

3.3.1. Speaking up: impact on whistleblower

The high risk of the whistleblower losing their job, being potentially downgraded, or their contract not being renewed are a few examples raised by interviewees of the possible consequences perceived of blowing the whistle.

Retaliation and punishment were other concerns highlighted, together with fear of being stigmatised, shamed, or simply being labelled a 'weak person' or 'troublemaker.' This was particularly felt by resident staff who do not have the option to relocate as mobile staff do.

"Speaking up can be very lonely."

3.3.2. Speaking up: impact on dependents

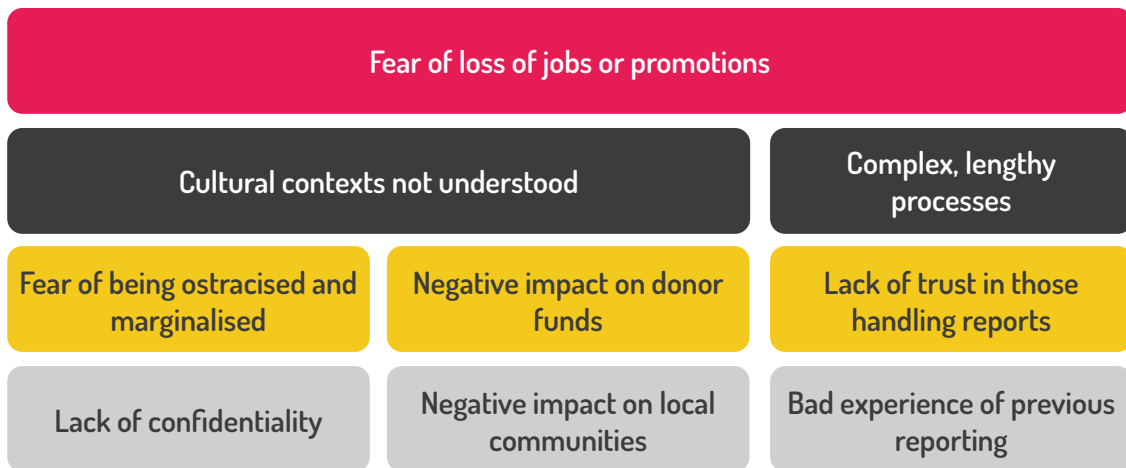
Many resident/local staff have families who are entirely dependent on their income. Some staff may be actively discouraged by their family from reporting as the loss of income, in the event of retaliation, would have huge consequences and implications for the entire family.

Often, staff do not want to be seen to 'make trouble' within the organisation and might be encouraged by family members or even peers to 'keep it in the family.'

3.3.3. Speaking up: impact on communities

Some interviewees raised their concerns about the impact reporting misconduct could have on the communities they serve. For example, would the assistance be suspended and withdrawn with a high risk for the organisation's reputation? Could communities become divided with a negative impact on their well-being?

Losing donor support was also mentioned as a main fear factor, resulting in possible loss of aid and assistance to affected populations.

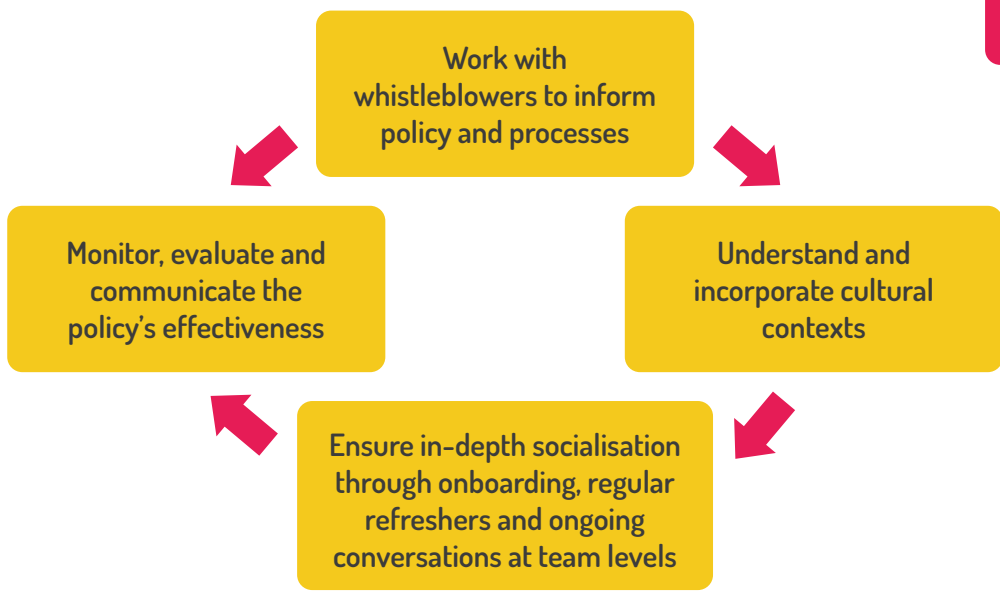


4. KEY RECOMMENDATIONS

4.1. ROLE OF POLICYMAKERS

Based on research, interviews, and exchanges, it was recommended that organisations, and in particular policymakers, take the following approach into consideration when reviewing or developing a whistleblowing policy:

"Flowcharts of process don't take into account human fallibility."



- Although not always easy to implement, those with lived experience of reporting and whistleblowing must have the opportunity to get involved in informing policy and process and advising on what could be done better from their perspective.
- Developing and issuing policies and processes from centralised headquarters must be done in close collaboration with offices in the field, instead of giving top-down instructions on how to implement a final policy. Conceptualising draft documents at headquarter level and contextualising them in the field can be an approach that includes all views.
- The whistleblowing policy must be systematically introduced at onboarding stages, followed by regular conversations with staff during their employment. To engage better with all staff, regular refresher training on whistleblowing mechanisms and procedures in place to protect whistleblowers must also be held.
- If not carried out already, organisations must monitor, evaluate, and communicate the policy's effectiveness to all staff to show that voices are heard and acted upon.

4.2. ROLE OF WHISTLEBLOWERS

Current and former whistleblowers from several countries were interviewed for this research. Several described their experiences of feeling ostracised and isolated, marginalised, labelled, or denied promotions.

Aid organisations understand the importance of providing victims and survivors with support, but whistleblowers who may become vulnerable by speaking up are often seen as adversaries, as a challenge for the organisation, with drawn-out processes and procedures damaging staff morale.

These testimonies are a sobering reminder of why the Alliance's work on this issue is so important.

It is critical that we understand and learn from those with lived experience of whistleblowing to help not only inform policy and process but also to foster a culture where staff truly feel safe to speak up. Involving individuals with personal whistleblowing experience is not always easy due to the potential risks they face, but there are an increasing number of support groups with valuable collective experience and knowledge who are ready to support, be involved in and are committed to developing this area of work.

4.3. ROLE OF LINE MANAGERS

Participants raised the important role of line managers in supporting a speak-up culture.

Good managers are seen as key in building trust, encouraging staff to come forward and speak up, in fostering regular open discussion in team or supervision meetings, and as leading by example (modelling good behaviour).

Several interviewees mentioned the absolute need to train and equip managers to understand not just the process but also their own biases and potential defensiveness. Throughout the conversations interviewees stressed the importance of equipping line managers to cope with their own challenges and emotions when receiving distressing reports and to know how to encourage their teams to speak up and come forward.

"We need line managers to understand that they are 'the arms and legs' of the policy."

4.4. ROLE OF PARTNER ORGANISATIONS

Many organisations work closely with local organisations to deliver services on the ground. Some interviewees found that staff from partner organisations can be reluctant to speak up for the same reasons as them.

It is key that lead organisations involve their partner staff in regular training or, if not possible or appropriate, support local organisations to develop and deliver training aimed at encouraging their staff to openly communicate and speak up; and in all cases, develop their own whistleblowing policies.

4.5. TRAINING AND DEVELOPMENT

Although online training and onboarding is often widespread in large organisations (and not just during Covid lockdowns), organisations need to examine how this supports or hinders a culture of trust. They must ensure training builds up solid, transparent, and trusted working relationships.

Opportunities must be created to hold conversations on whistleblowing with staff on a regular basis throughout their employment, as well as on other issues that foster open communication and trust. Some concrete good examples of team discussions during one-to-one meetings exist, with regular reminders of the importance of speaking up.

4.6. LINK WITH ANTI-RACISM AND EQUALITY, DIVERSITY, AND INCLUSION (EDI) APPROACHES

Many organisations have started working in more depth on developing and implementing anti-racism strategies, as well as EDI approaches within their organisational culture.

Those interviewed stated with emphasis the need to link these areas of work with whistleblowing. This would help broaden the conversation about power and privilege to cover all aspects of it, and to better understand how these issues are connected.

4.7. MODELLING PRACTICE BASED ON COMMUNITIES

The aid sector has well understood and integrated the importance and necessity of accountability to the communities and people it supports while designing, implementing, and monitoring programmes. Listening to community concerns and views, providing spaces and opportunities for people to raise their voices, and providing feedback is now embedded into good programme delivery. Some interviewees said that such good practices and models with communities should also be followed within organisations (e.g. in working relationships) to encourage an open organisational culture and to foster a speak-up culture.

4.8. TAKING A LONG-TERM VIEW

Across the sector, there are many short-term and stand-alone solutions, but these are not always able to change underlying issues. Long-term formal evaluations and assessments should be carried out to identify good practices that could then be analysed, shared, and replicated by other organisations.

This work to identify good practices on whistleblowing and fostering a speak-up culture is something that could be conducted by the Alliance, due to its extensive memberships and geographical presence worldwide, in partnership with other networks or organisations.

4.9. ROLE OF THE ALLIANCE

Interviewees were asked what role the Alliance could play in taking a step further to promote and encourage people to report misconduct and build on our recently published [Whistleblower Protection Guidance](#). The following suggestions were made in this regard:

- encourage more accountability between Alliance members by publishing data and sharing experience and specific good practices on whistleblowing from members;
- disseminate and apply the Alliance’s [updated Sexual Exploitation, Abuse and Harassment \(SEAH\) Investigation Guide](#);
- continue translating every policy and guidance in several languages to ensure accessibility for all members;
- identify, collect, analyse, and publicise good practices amongst Alliance members to lead by example and encourage others to follow.



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