

Better Cotton

Whistleblowing Policy

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Policy Statement

As an organisation, Better Cotton is committed to maintaining an open culture with the highest standards of honesty, integrity and accountability. The Better Cotton Whistleblowing Policy is an essential function to ensure that no wrongdoing occurs at Better Cotton without accountability.

Whistleblowing is the name given to the act of a disclosure of information to the employer or relevant authority by an individual who knows, or suspects, wrongdoing or illegal acts in the workplace. The Better Cotton Whistleblowing Policy provides a mechanism for reporting, investigating and addressing any such wrongdoing and is designed to allow staff to report concerns without being penalised for reporting in any way.

Better Cotton strongly encourages the reporting of any suspected misconduct, illegal acts or unethical conduct by its employees, workers, volunteers, members, council members, partners or contractors.

Definition and Purpose

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to Better Cotton's people or activities that can be considered to have a serious or wide-spread impact or be of public interest. The disclosure may be about the alleged wrongful conduct of the employer, a colleague, client, or any third party connected to the organisation.

Whistleblowing concerns can include:

- Financial misconduct including bribery and fraud.
- A failure to comply with any legal obligations or regulatory requirements.

- Dangerous practices at work including health and safety concerns that could cause harm to employees or the public.
- Damage to the environment
- A criminal offence that has been committed, is being committed or is likely to be committed.
- Sexual exploitation, abuse or harassment
- Abuse of a position of power, unethical conduct or breach of professional obligations
- A miscarriage of justice
- The deliberate concealment of information relating to any of the matters listed above.

Incidents of sexual exploitation, abuse or harassment will be managed through the Safeguarding Policy which has more detailed guidance for the response and management of safeguarding incidents. The protections of the Whistleblowing Policy will still apply to all staff who report concerns or act as witnesses in a safeguarding investigation.

Scope

This policy is applicable to employees, agency staff, workers, volunteers, members, Council members, partners and contractors.

To be managed under this policy the person must reasonably believe that the disclosure is “in the public interest”. This covers any such concern that could affect the rights, health, or finances of the organisation, or public at large in any setting. Typically, the whistleblower is not directly, personally affected by the danger or illegality, although they may be and feel that they cannot raise their concerns under the Employee Grievance Procedure.

Staff wishing to submit a grievance relating to their job or employment should do so in the first instance through reporting the concern to their line manager, or if this would not be appropriate through the Employee Grievance mechanism.

Anyone outside of the staff team who engages with Better Cotton is encouraged to report wrong-doing by Better Cotton staff and may do so through the Better Cotton Complaints Policy.

Protections to workers

The Whistleblowing Policy protects workers from any penalties or negative repercussions arising from reporting a concern, including dismissal, disciplinary action of any kind, demotion, change of role or team and unwarranted limitations on future progression within the organisation arising directly as a consequence of reporting a concern.



Any person who threatens or retaliates against a whistleblower in any way will have committed gross misconduct and will face disciplinary actions in line with the Better Cotton Disciplinary Policy.

As long as the person raising a concern does so in good faith, they need only to genuinely believe that there is an issue before making a disclosure. If, under investigation, the disclosure is found to be unsubstantiated, the person who raised the concern will still be protected under the Better Cotton Whistleblowing Policy.

If the person making the disclosure does so in bad faith, with malicious or vexatious reasons, then they will not be protected under the Whistleblowing Policy and their complaint may result in disciplinary action, up to and including dismissal without notice (in the case of salaried staff) and equivalent action in the case of other persons connected to Better Cotton including volunteers and affiliates.

These protections apply to staff who have raised concerns through other reporting mechanisms within Better Cotton including through the Safeguarding Policy and Complaints Policy.

Reporting a Concern

A concern may be submitted through the following methods:

- By email to whistleblowing@bettercotton.org
- Through the form on the website available at bettercotton.org/whistleblowing
- In person to a member of the Safeguarding, Complaints and Whistleblowing team.

The whistleblowing@bettercotton.org email address is monitored by an Incident Monitoring Group consisting of three Better Cotton staff members.

After receiving a report, the Incident Monitoring Group will review the concern(s) raised, where possible within 72 hours, and a meeting with the individual will be arranged to gain more information and determine whether the concerns raised meet the definition of Whistleblowing under this policy. Those raising concerns may bring a colleague or third party to any meetings arranged under this policy. Any such colleague or third party must respect the confidentiality of the disclosure and any subsequent investigation into it.

If the reporting staff member has reasonable grounds to believe that the organisation is not appropriately addressing the report, they have a right to escalate the report to the Council or to an external statutory body.

Investigations

Any reported concern meeting the definition of a whistleblowing incident will be investigated promptly and, depending on the nature of the concern, may be reported to the police or an



appropriate oversight body. Investigations will be conducted by a team of no less than two external experts, ideally with a gender balance, who will conduct interviews and review available evidence with the aim of determining whether wrong-doing has occurred and to what extent.

The anonymised findings from the investigators will be submitted to a decision-making group. This group will be formed of members of the Better Cotton Executive Group or Council as appropriate depending on the nature of the concerns raised to ensure that there is no conflict of interest for any member of the decision-making group.

This group will make a decision on the outcomes and next steps of the investigation, including disciplinary procedures and referral to relevant authorities where appropriate. Confidentiality will be maintained throughout the process.

Better Cotton aims to make a decision within three months of a report being made, although depending on the circumstances this timeframe may increase.

Confidentiality

Confidentiality will be maintained at all times. This means that information will only be shared with those that have a direct need to have access to it for the purposes of investigating or resolving the concern. Better Cotton will protect the identities of anyone involved where possible. Better Cotton will only reveal identities to those with a legitimate need to receive that information including those involved in investigating the concerns, or to other third parties such as the police where Better Cotton believes there is a legal or regulatory obligation to do so.

Conflict of Interest

The objective of the Whistleblowing Policy is to ensure that all valid concerns are investigated and followed up with effectively. To this end it is essential that conflicts of interest are avoided for those involved in any way in the response to an incident. Investigations should be conducted by expert external investigators to reduce the risk of internal bias.

In the event of a disclosure relating to Better Cotton's CEO or where there may be a conflict of interest for Better Cotton's senior leadership, the Incident Response Task Force on Council will take on direct oversight and responsibility for ensuring an incident is properly investigated and managed in line with the requirements of this policy.

If an incident involves a member of the Incident Response Task Force on Council, a new group will be appointed including the addition of an independent Whistleblowing expert. Should an incident involve a member of the Council Executive Committee, the General Assembly will be called upon as the ultimate arbiter of concerns related to Better Cotton.

Compliance with Donors and Regulatory Bodies

The 2019 EU Whistleblower Directive and the UK Public Interest Disclosure Act 1998 ensure that legal protection is available to those who raise concerns of misconduct. Under the EU Whistleblower Directive, organisations with more than 50 employees must provide internal reporting mechanisms, guarantee whistleblower protections and acknowledge reports within one week. The protections extend beyond the organisation’s employees, covering interns, suppliers and other external stakeholders. Switzerland does not have similar legislation in place but is under OECD Guidance to introduce it.

The spirit of the UK Public Interest Disclosure Act 1998 and the 2019 EU Whistleblower Directive is to be followed in all countries Better Cotton operates in, even if out of jurisdiction. Better Cotton stands firmly in our commitment to protect our employees from detrimental treatment, dismissal, victimisation or any other disadvantage related to raising whistleblowing concerns in good faith.

Depending on the country that Better Cotton is operating in there may be a requirement for Whistleblowing incidents to be reported to a government or independent regulatory body. Some institutional donors and private funders may also have additional reporting requirements. It is the responsibility of the relevant Decision-making group to ensure that Whistleblowing reporting requirements are met where required in the event of an incident.

Learning

After an incident it is essential to undergo learning and improvement processes in order to avoid similar incidents occurring in the future.

Review

The Better Cotton Executive Group is responsible for reviewing this policy on an annual basis.

History

Version	Date	Updated by	Notes / Summary of change(s)	Approver/s and Date Approved
1.0	02/2021	HR	First version	CEO, 02/2021
2.0	04/2024	People & Culture	Introducing the right to escalate whistleblowing reports to Council if there is a conflict of interest for the matter to be managed internally.	COO, 06/2024

