

Neotree exists to eradicate preventable newborn mortality,  
by putting the lifesaving power of technology  
into the hands of doctors and nurses in low income countries



*Approved by: Board of Trustees*  
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## **WHISTLEBLOWING POLICY**

### **Content**

1. Policy Statement
2. Responsibility for Policy
3. Scope
4. Whistleblowing
5. Associated policies
6. Raising a whistleblowing concern
7. Confidentiality
8. Protection and support for whistleblowers
9. Investigation and outcome
10. External Disclosures
11. The Charity Commission
12. Contact information
13. Further information

## **1. Policy statement**

Neotree ('Neotree', 'we' or 'us') is committed to transparency and honesty as reflected in our core values. It is our policy to conduct all of our business in an honest and ethical manner and we expect all personnel working or associated with us to act with integrity in all of their dealings related to our business. We are committed to protecting whistleblowers and ensuring that their concerns are addressed promptly and appropriately. This policy is designed to encourage individuals who come into contact with the charity, to report concerns about any and all wrongdoing in respect of the organisation and its 'staff' (see scope below).

## **2. Responsibility for Policy**

The Board of Trustees have overall responsibility for the effective operation of this policy and is responsible for reviewing the effectiveness of actions taken in response to any concerns raised under this policy.

All staff are responsible for the success of this policy and should ensure that they report any suspected wrongdoing immediately after becoming aware of the matter.

This policy is reviewed annually by the Board of Trustees and updated as needed.

## **3. Scope**

The policy applies to all individuals working, or volunteering, at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary and working full- or part-time), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, third party representatives, freelance consultants and contractors, business partners or any other person associated with us or our partners, wherever located. For the purposes of this policy, we will refer to the term 'staff' to include everyone noted above. All staff are expected to be familiar with this policy, comply with its terms and keep themselves up to date with any changes. The policy is intended to protect all Neotree staff and ultimately, the babies, mothers, families, community representatives, and healthcare workers that we support via our digital health platform, training, education and community engagement.

This policy is non-contractual and for guidance only. It does not form part of any contract of employment or engagement and we may amend it at any time.

## **4. Whistleblowing**

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes (but is not limited to) bribery, facilitation of tax evasion, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

A whistleblower is a person who raises a genuine concern relating to any of the above. They can be staff but also patients, mothers, families, or community representatives. Anyone with any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) should report it under this policy.

This policy should not be used for complaints relating to a staff member's personal circumstances, such as the way they have been treated during their time with us. In those cases, staff should raise their concerns with their line manager.

## **5. Associated policies**

- 5.1. Safeguarding**
- 5.2. Anti-bribery and Corruption**
- 5.3. Conflicts of Interest**

## **6. Raising a whistleblowing concern**

We hope that in many cases staff will be able to raise any concerns with their line manager. However, where they prefer not to raise it with their line manager for any reason, they should contact the Chair of Trustees, Yali Sassoon, whose contact details are set out at the end of this policy. Any suspected wrongdoing should be reported as soon as possible. Mothers, families, or community representatives should also report any concerns they have to the Chair of Trustees, Yali Sassoon, as soon as possible.

We will arrange a meeting with individuals as soon as possible to discuss any concerns raised under this policy. Individuals may bring a companion (e.g. a colleague or family member/patient representative) to any meetings under this policy. The companion must respect the confidentiality of the disclosure and any subsequent investigation.

## **7. Confidentiality**

When raising a concern, individuals should consider whether they wish to do so on an open or confidential basis. We would like to encourage individuals to identify themselves when making a report, as anonymous reports are more challenging and difficult to investigate. If individuals wish to raise the concern on a confidential basis and keep their identity anonymous, we will do all that we can to ensure they retain their anonymity, and the confidentiality of their concerns, as far as possible. However, it should be noted that there may be instances where this is not possible. If we need to disclose their identity to others as part of an investigation, we will aim to discuss this with them beforehand and our reasons for wishing to do so.

When raising a concern, individuals must treat any information about it, and any investigation about it, as confidential. The investigation may need to be carried out under the terms of strict confidentiality (i.e., by not informing the subject of the complaint until (or if) it becomes necessary to do so). For example, this may be appropriate in cases of suspected fraud.

## **8. Protection and support for whistleblowers**

We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If individuals believe that they have suffered any such treatment, they should inform the Chair of Trustees immediately.

Staff must not threaten or retaliate against whistleblowers in any way. If staff are involved in such conduct, they may be subject to disciplinary action.

## **9. Investigation and outcome**

Once individuals have raised a concern, we will carry out an initial assessment to determine the scope of any investigation and inform them of the outcome of our assessment. Individuals may thereafter be required to attend additional meetings in order to provide further information.

In some cases we may appoint an investigator or team of investigators to look into their concerns. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

We will aim to keep individuals informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving them specific

details of the investigation, an outcome or any disciplinary action taken as a result. Individuals should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

## **10. External Disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing within the Charity. In most cases staff should not find it necessary to alert anyone externally.

In some circumstances staff may wish to report their concerns to an external body such as a regulator or a 'prescribed person' such as the Charity Commission (England and Wales). We strongly encourage individuals to seek advice before reporting a concern to anyone external. Protect (an independent, UK whistleblowing charity) operates a confidential helpline. Their contact details are at the end of this policy.

## **11. The Charity Commission (England and Wales)**

Under the Public Disclosure Act 1998, workers may raise a whistleblowing concern with a 'prescribed person'.

The Charity Commission (England and Wales) is a 'prescribed person' to whom protected disclosures can be made regarding the administration of charities and charitable funds, including issues that could cause 'serious harm' to the service, reputation, recipients and staff of the charity.

Any whistleblowing disclosures made to the Charity Commission must be in good faith as it is a criminal offence to knowingly or recklessly provide false or misleading information to the Charity Commission.

For further information, please see

<https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

## **12. Contact Information**

Chair of Trustees	Yali Sassoon +44 7841 954 117 <a href="mailto:yali@neotree.org">yali@neotree.org</a>
Protect (Independent whistleblowing charity)	Helpline: 020 3117 2520 Website: <a href="https://protect-advice.org.uk">https://protect-advice.org.uk</a>
The Charity Commission	<a href="mailto:whistleblowing@charitycommission.gov.uk">whistleblowing@charitycommission.gov.uk</a>

**13. Further information**

Individuals with any questions about or feedback on this Policy, should contact Neotree’s Executive Director, Martha Paren on [martha@neotree.org](mailto:martha@neotree.org).