

External Stakeholder & Whistleblower Protection Policy

Raising a concern should never come at a cost

We want people to feel able to tell us when something doesn't feel right.

That means creating a way for people to raise genuine concerns – but just as importantly, making sure they are protected when they do.

This policy explains how Mother protects people outside our business who raise a concern through our External Grievance & Complaints process, or who help us understand or investigate one.

It sits alongside our [*External Grievance & Complaints Procedure*](#) and is separate from Mother's internal employee whistleblowing and grievance procedures.

Who does this protect?

The protections in this policy apply to anyone who raises a genuine concern about Mother through our external process or helps us look into one.

That might include:

- freelancers and contractors;
- suppliers;
- clients;
- business partners;
- prospective employees or workers;
- people or organisations affected by our work;
- members of communities we work in or alongside; and
- other external stakeholders.

It also protects people who provide information or otherwise help us investigate or resolve a concern.

Our commitment

Mother will not tolerate anyone being treated badly because they raised a genuine concern.

You are protected if you genuinely:

- raise a concern;
- make a complaint;

- provide information about a concern;
- help with an investigation; or
- support somebody else who raises a concern.

You don't need to prove that your concern was right in order to be protected. We simply ask that concerns are raised genuinely.

Deliberately providing information you know to be false or making a malicious allegation isn't protected by this policy.

What do we mean by retaliation?

Retaliation is when someone is disadvantaged or treated badly because they have raised a concern or helped with one.

It could include:

- threats or intimidation;
- harassment;
- discrimination;
- unfair treatment;
- losing or having work reduced;
- having opportunities withheld;
- being treated differently in a contractual or commercial relationship;
- being pressured to withdraw a concern;
- trying to identify someone who has raised a concern anonymously without a legitimate reason;
or
- encouraging someone else to retaliate on your behalf.

It can be direct or indirect and we won't tolerate either.

Protecting your confidentiality

We'll keep the identity of someone raising a concern confidential as far as reasonably possible.

Information will only normally be shared with people who genuinely need it to understand, investigate or resolve the issue.

Where possible and appropriate, we'll explain at the outset who we think may need to be involved.

If we later think information needs to be shared with someone else, we'll discuss this with you and seek your agreement where reasonably possible and appropriate.

There may occasionally be circumstances where we have to disclose information because of a legal, regulatory or safeguarding responsibility. If that happens, we'll explain this wherever we're able to.

Anyone involved in handling a concern is expected to respect its confidentiality. An inappropriate breach of confidentiality will be taken seriously and may result in disciplinary, contractual or other appropriate action.

Thinking about risk

Every situation is different, so when a concern is raised we'll consider whether raising it could put that person – or someone else – at risk.

We'll think about things such as:

- the nature and seriousness of the concern;
- the person's relationship with Mother or another organisation involved;
- who the concern is about;
- anything the person raising it is particularly worried about;
- whether their identity is already known or could become known;
- whether there is a particular imbalance of power or vulnerability; and
- whether we need to put any immediate protections in place.

We'll keep this under review while the concern is being looked into.

How might we protect someone?

There isn't a one-size-fits-all answer.

Depending on the circumstances, we might:

- tightly restrict who knows the person's identity;
- limit access to documents or information;
- anonymise information where we can;
- agree a different or safer way of communicating;
- change who is responsible for looking into the concern;
- bring in an independent third party;
- monitor the situation for signs of retaliation;
- take appropriate action in relation to a supplier, contractor, client or other business relationship; or
- put other reasonable safeguards in place.

Where we can, we'll involve the person who raised the concern in deciding what protection would be most helpful.

Can I raise something anonymously?

Where our reporting mechanism allows, yes.

We'll take an anonymous concern seriously and assess it based on the information available to us.

It can sometimes be harder to investigate something if we can't ask follow-up questions, so where someone feels comfortable doing so, providing a confidential way for us to contact them can help.

What if someone does retaliate?

If you think you or someone else has been treated badly because a concern was raised, please contact us by emailing: **tellus@motherfamily.com**

We'll take any allegation of retaliation seriously and, where appropriate, look into it separately from the original concern.

What happens if retaliation is found?

There will be consequences.

If a Mother employee is found to have retaliated against someone for raising a concern, we'll take appropriate action under our internal policies and procedures, which may include disciplinary action.

If it involves a contractor, supplier, client, business partner or another third party, we'll consider the appropriate contractual or business response.

Depending on the circumstances, that could include asking for action to be taken, escalating the issue within the organisation concerned, reconsidering the relationship or, where appropriate and legally possible, ending it.

We may also take action where someone deliberately breaches the confidentiality of a concern or improperly tries to identify someone who has raised an issue anonymously.

When might we involve someone independent?

There may be times when it doesn't feel right for Mother to investigate something ourselves.

For example, where a concern is particularly serious or sensitive, involves a senior person, creates a potential conflict of interest or presents a heightened risk to the person who raised it.

In those situations, we may ask an appropriately independent person or external third party to help us review or investigate the concern.

How to raise a concern

You can raise a concern by emailing: **tellus@motherfamily.com**

You can read more about what happens next in our [External Grievance & Complaints Procedure](#).