



GESCI

WHISTLEBLOWER POLICY

POLICY STATEMENT

Revised 2023

1. Purpose

This policy is designed to encourage and enable staff, volunteers, consultants, partners, and beneficiaries to raise concerns regarding actual or suspected misconduct, fraud, corruption, abuse, or violations of organizational policies and donor regulations, without fear of retaliation.

2. Scope

This policy applies to:

- Employees (full-time, part-time, and temporary)
- Volunteers and interns
- Consultants and contractors
- Sub-recipients and implementing partners
- Beneficiaries and community stakeholders

3. Principles

- **Confidentiality:** All reports will be treated with the highest degree of confidentiality.
- **Non-Retaliation:** Whistleblowers will be protected against any form of retaliation, harassment, or victimization.
- **Good Faith:** Reports must be made in good faith. Malicious or knowingly false allegations are prohibited.
- **Donor Accountability:** All concerns will be handled in line with donor compliance requirements and INGO safeguarding standards.

4. Reportable Concerns

Concerns may include, but are not limited to:

- Fraud, bribery, and corruption
- Misuse or diversion of donor funds or assets
- Procurement or financial irregularities
- Abuse of power, harassment, or exploitation (including sexual exploitation and abuse)
- Breaches of donor rules, organizational codes of conduct, or local laws
- Health, safety, and security violations

5. Reporting Mechanisms

Concerns can be reported through:

- **Whistleblower Hotline or Email:** A dedicated, confidential channel managed independently (e.g., compliance@ingo.org).
- **Direct to Line Manager or Senior Management:** If appropriate.
- **Direct to Donor (if applicable):** In cases where reporting internally is not safe or effective.
- **Anonymous Reporting:** Allowed, though sufficient detail should be provided to enable investigation.

6. Investigation Process

- **Acknowledgment:** Receipt of complaint within 7 working days.
- **Preliminary Review:** Assessment of validity, scope, and urgency.
- **Investigation:** Independent and impartial inquiry, led by

Compliance/Investigation Unit or external auditor if necessary.

- **Outcome & Action:** Findings shared with management and, where required, with donors. Corrective measures, disciplinary actions, or referral to authorities will follow.

7. Protection of Whistleblowers

- Retaliation against whistleblowers is strictly prohibited.
- Any employee or partner found to have retaliated will face disciplinary action, up to and including termination of employment or contract.
- Whistleblowers will be supported, including psychosocial or legal assistance if necessary.

8. Responsibilities

- **Management:** Ensure a safe environment for reporting and follow up on investigations.
- **Staff and Partners:** Report concerns honestly and cooperate with investigations.
- **Board of Directors/Trustees:** Provide oversight and ensure policy enforcement.

9. Communication & Training

This policy will be:

- Shared with all staff, sub-recipients, and partners during induction.
- Published on the organization's website and notice boards.
- Supported with regular training on whistleblowing and donor compliance.

10. Review

This policy will be reviewed every two years, or earlier if required by changes in donor regulations, organizational policy, or local laws.