**WHISTLEBLOWING PROTECTION POLICY**

Document type - Policy

Applies -   to all programs and projects

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Date of next review and monitoring-  March 2024

**General provisions**

The CO "CF "SOS Civil Defense Headquarters" (hereinafter - the Organization) encourages everyone to report any behavior that is illegal or violates the Organization's Code of Conduct.

This Policy serves as a guide for individuals who have specific concerns that a representative of the Organization's ethical conduct may be at risk. It addresses how individuals can report specific concerns, how the Organization will handle reports, and protection from retaliation for reporting.

This Policy has been adopted to ensure that anyone may report wrongdoing that may adversely impact the Organization, beneficiaries, donors and other stakeholders without fear of retaliation or negative impact on their employment or engagement status at the Organization.

This Policy is not intended to address general workplace complaints, interpersonal problems or other issues not related to sefeguarding violations.

All representatives of the Organization are obliged to report any violations of the policies and procedures of the Organization.

The organization will take action in an objective and appropriate manner to resolve all reports of alleged misconduct without retaliation against whistleblowers. In addition, the Organization undertakes to ensure protection of the whistleblower from victimization, retaliation and other harmful treatment by other representatives.

Anyone who makes a knowingly false complaint of wrongdoing or provides knowingly false information about a complaint is a violation of the Policy. This will result in disciplinary action.

**Definitions**

**Whistleblower** - a whistleblower is a person who comes forward and shares his/her knowledge on any wrongdoing which he/she thinks is happening in the network, office, or in a specific activity. A whistleblower could be an employee, a contractor, or a supplier, or anyone who becomes aware of any illegal activities.

**Whistleblowing** - the deliberate and voluntary disclosure of misconduct by the Organisation or for which the Organisation is accountable (e.g. misconduct by a staff member, volunteer, partner or supplier). The disclosure or attempted disclosure can be by any stakeholder within or outside the network and may be anonymous. The disclosure could be through access to the data, events, files or any other information about an actual, suspected or anticipated wrongdoing within the Organisation.

**Whistleblowing Event -** concerns that may significantly threaten the health or safety of people, and any irregular/unlawful departmental or organizational practice, including any non- compliance with statutory regulations which affect or that could threaten staff, beneficiaries, donors, the image and/or reputation of the Organisation. These concerns might be:

* A criminal offence or illegal activity (including fraudulent and corrupt behavior, e.g. theft, fraud);
* A child safeguarding incident;
* Sexual exploitation, sexual abuse, or sexual harassment;
* A miscarriage of justice;
* Financial wrongdoing may also include the following examples but not be limited to “side deals” or “under the table” dealings with contractors for personal benefit; receiving personal kickbacks or significant gifts from contractors or vendors which could create bias in the tendering process.

**Cases of whistleblowing event:**

* An act creating risk to health and safety of persons or the environment;
* Significant neglect in management;
* Knowingly directing or advising someone to commit any wrongdoing described above;
* A breach of any other legal obligation;
* Concealment of any of the above;
* Any attempt to prevent an individual from raising their concerns.
* To report other types of wrongdoing such as accepting gifts which are intended to influence decision making and deliberate disregard or serious breach of the Organisation’s Code of Conduct.

**Mechanisms to Report Whistleblowing Events**

If you believe in good faith that you have uncovered or observed evidence that indicates abuse, fraud, malpractice or any other breach of the Code of Conduct or something considered a Whistleblowing Event at the Organisation, you are expected to report it. Concerns may be raised verbally or in writing and should include full details and, if possible, supporting evidence. Confidentiality is assumed unless the complainant agrees that his/her identity may be revealed. The identity of the individual(s) reporting misconduct should remain confidential to the maximum extent possible. In respect of allegations of child abuse or sexual exploitation and abuse, it is important to remember that the best interests of the child and/or survivor are paramount. Any allegation should be reported confidentially to the appropriate individual, since any breach of confidentiality outside of the reporting lines could have devastating effects on the life of the child and/or survivor and his/her family.

**Note on Anonymous Disclosure and Confidentiality**

Proper investigation may be more difficult or even impossible without having direct access to the individual who initially raised the concern. It is recommended to disclose your identity if possible. The more information that you can provide, the easier it is for the Organisation to progress our investigations. If you do wish to make a verbal disclosure and remain anonymous, the Organisation will take reasonable steps to keep your identity secret but does not guarantee your anonymity, including because there may be circumstances when you may be needed as a witness (for example, if your report becomes the subject of a criminal investigation). Should this be the case, the Organisation will seek to discuss the matter with you at the earliest opportunity. Nevertheless, the Organisation will investigate all credible concerns that are raised, even if they are raised anonymously.

**Receiving and Referring Whistleblowing Disclosures**

The whistleblower can disclose improper activity as part of normal reporting activity to their manager or designated person in their office to receive serious complaints in a manner which maintains confidentiality, if desired. If the reported activity is outside the scope of this Policy, the Appropriate Person should direct it to the appropriate authority (e.g. police).

**Investigations into Whistleblowing Disclosures**

Anyone called upon to assist with the investigation will have a duty to keep the investigation and information provided confidential. The Organisation will aim to keep the whistleblower broadly informed of the progress of the investigation and its likely timescale, when appropriate and relevant. Any information shared with the whistleblower about the investigation will be deemed as confidential.

* The investigation report will likely include gathered evidence, be anonymized to protect the witnesses, who will have the opportunity to respond during the investigation, and include the subject of complaint’s defense to the allegations.
* Investigation reports about substantiated allegations that involve individuals who could pose a risk to the Organisation will be stored in electronic form indefinitely. Copies of the investigation reports will also be included in the relevant employee files.

**Protections Against Retaliation**

All Organisation staff members and volunteers have a duty to report any breach of thre Organisation’s policies and procedures to officials whose responsibility it is to take appropriate action. An individual who makes such a report in good faith has the right to be protected against retaliation.

The Organisation staff is obliged to cooperate with duly authorized audits, investigations, and other oversight activities. An individual who does so, has the right to be protected against retaliation.

If an Organisation Representative tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, the Organisation will treat this as a serious disciplinary offence that could lead to dismissal.

Retaliation against individuals who have reported or provided information concerning acts of misconduct, or who have cooperated with audits or investigations or other oversight activities is prohibited. Such behavior violates the fundamental obligation of all staff members and volunteers to uphold the highest standards of efficiency, competence and integrity to complete their functions and regulate their conduct with the best interest of the Organisation in view.

Retaliation against outside parties is prohibited. Any retaliatory measures (including threats) against a contractor or its employees or any other individual engaged with the Organisation because such a person has reported misconduct by the Organisation staff will be considered misconduct that, if established, will lead to administrative and/or disciplinary action.

**Reporting Retaliation**

Individuals who believe that retaliatory action has been taken against them because they reported misconduct should forward all information and documentation available to them to support their complaint to the Organisation.

If someone within the Organization has asked you to redact your complaint or tried to stop you from reporting, please contact an administrator at the Organisation. This should be done promptly and, in any event, no later than 1 month after the alleged act or threat of retaliation has occurred.

**Whistleblowing Report Form**

The following form is a template for people to disclose whistleblowing events. Complainants can disclose as little or as much information as he/she prefers; however, if details are incomplete it could impact and/or limit the investigation.

**Contact Information**

**Name**: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Preferred method of contact** (mailing address, cell or home phone number, email address, etc.) \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Disclosure of Incident(s):** Please provide as much detail as possible. If you wish to remain anonymous, do not include your relationship to persons identified in your report or your location relative to persons or incidents in your report.

1. Please provide details with respect to the location of the incident.

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2. Please describe the nature of your concern. If possible, please include sufficient information for an independent person to understand the concern and to enable further investigation. You can check multiple boxes.

□Dishonest or fraudulent activity

□ Substantial mismanagement of the Organisation resources

□ Sexual misconduct: sexual harassment, exploitation, or abuse

□ Child safeguarding incident: physically, verbally, or sexually abusing or neglecting a child

□ Corruption

□ Conduct involving substantial and specific danger to public, health or safety

□ Conduct involving substantial risk to the environment

□ Other: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

3. Please state the full name(s) and title(s) of individuals whom you suspect of wrongdoing

4. How many times has this incident or, similar related incidents taken place (if applicable)?

5. How long has this incident or, similar related incidents been taking place (if applicable)?

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6. Are you aware of any other persons observing this incident, or similar related incidents? (Yes or No)

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7. Would you like to arrange a meeting/telephone call with the relevant Organisation staff member to discuss this matter? (Please note that this option is only open to individuals who chose to provide their name)

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8. Please provide any additional information about the wrongdoing and the person(s) alleged to have committed the wrongdoing.

Director of CO "SOS Civil Defense Headquarters"