

## WHISTLE BLOWING POLICY

### Reporting

1. Chief Executive Officer must ensure that all staff, volunteers, suppliers, consultants and implementing partners, as well as project beneficiaries with which the organisation has contact, are aware of this Whistle blowing policy.

2. All staff, volunteers, suppliers/consultants and implementing partners, as well as Project beneficiaries with which the organisation has contact, must report in good faith (that is, without malice) any genuine suspicion they have of:

- Serious malpractice;
- which is happening in the Zimbabwe or overseas (i.e., in the territory in which the organisation implements projects); and
- which involves Centre for Humanitarian Analytics' staff members, Consultants or volunteers or organizations with which it contracts.

3. Any such report must be made confidentially and in line with this policy. Concerns may be raised orally or in writing and should include full details and, if possible, supporting evidence.

4. Different individuals have different reporting lines under this policy. Procedure 5 sets out what individuals should do if they do not feel they can report to the people listed below (see the guidance below for definitions):

- Staff should discuss their concerns in confidence with their line manager or a more senior manager and use all relevant grievance procedures.
- Volunteers should discuss their concerns in confidence with their line manager.
- CHA suppliers/consultants should raise their concerns in confidence with the commissioning manager who set the terms of reference for their project or contract.
- Implementing partners should raise their concerns in confidence with the CHA's manager who is responsible for the Programme or project on which they are working.
- Children or young people should raise their concerns in confidence with the person in charge
- or an adult whom they feel will be able to help them raise their concerns

5. If any person feels unable to raise their concerns through the people mentioned in Procedure 4, either because that person may be involved in the serious malpractice or because they have previously raised it and they feel that their concerns have not been acted upon, they should raise their concerns with the below persons, referred to in this policy as "Named Persons":

- The Chief Executive Officer or (if not appropriate);
- Board Chair

6. Staff who, in good faith, raise concerns in line with this policy must be protected by CHA from victimization and other detrimental treatment.

7. If a staff member makes an allegation which is not in good faith and is found to be false or malicious this will be treated as a serious disciplinary offence and will be investigated under that

staff member's disciplinary procedure. If a consultant makes an allegation of the same nature, this will be treated as a serious matter and dealt with in accordance with the relevant consultant complaints procedure.

8. If a staff member tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, CHA will treat this as a serious disciplinary offence which will be investigated in accordance with CHA's disciplinary policies and procedures.

9. Executive Director must consider whether disciplinary action should be taken if a false or malicious allegation is made, or a staff member has tried to prevent an individual making a report or victimized that individual.

10. Any person raising concerns must be treated fairly. Feedback must be given to those who raise concerns on what actions have been taken to address them unless this is not possible due to requirements of confidentiality (there may be some delay in the giving of feedback depending on the length of the investigation).

11. If a report is made anonymously, it is more difficult for CHA to take action.

Anonymous reports should not be made if there is any alternative. If a concern is reported anonymously, management will decide whether or not to act on the allegations and in what way (see further guidance below).

12. The identity of those raising their concerns must be kept confidential as far as possible. Complete confidentiality will not always be possible but if an individual's name is to be disclosed, the individual should be told first unless there is a legal requirement not to do so or on police advice.

### **Action on receiving a report**

1. CHA managers must treat all concerns raised seriously and deal with them in accordance with this policy.

2. CHA managers must make themselves aware of this policy and other related policies (see guidance below on related policies). They must consider whether it might be more appropriate to use a different policy to deal with the report e.g., Child Safeguarding Policy (for suspected child abuse), Fraud and Dishonesty Policy (for suspected fraud). If it is not more appropriate to use another policy, CHA managers must report all allegations of serious malpractice to one of the two Named Persons set out in Procedure 5.

3. CHA is committed to being open and transparent. Very occasionally, as in all large organizations, a person working for or with CHA may appear to be acting improperly, negligently or criminally. CHA ensures with this policy that all staff members, consultants and volunteers have the opportunity to report such serious malpractice.

4. CHA will ensure that those who raise concerns of suspected serious malpractice are protected from dismissal, victimization or any other detrimental treatment by CHA, provided they follow this policy.

5. The process set out in Procedures 2 to 4 may not be the most appropriate way for children and

young people to report concerns and complaints. This Whistle Blowing policy is one avenue through which children and young people's concerns can be raised – there are others that may be more appropriate in the circumstances. See also the Child Safeguarding policy for further information.

6. Anonymous reporting a crime in two forms:

- An individual sends a letter or makes a phone call to management and makes an allegation or statement without leaving their name. This is difficult to act upon as there may be no or little corroborated evidence to substantiate the allegations. However, this does not mean that there is no serious malpractice or misconduct taking place. Management will have to make a choice of either ignoring the anonymous information or “informally” investigating the information, initiating formal proceedings if corroborating evidence is found.
- An individual makes an allegation or statement to management, but wants their identity kept secret from those that they have accused of serious malpractice/misconduct. CHA understands that some people may wish to report their concerns anonymously and accepts that this may occur from time to time. However, CHA feels that it is more appropriate for individuals to come forward with their concerns rather than raising them anonymously. Anonymous reporting can make it difficult to clarify the issues, substantiate claims and investigate concerns properly.