

3/1/2024

# Whistle Blowing Policy

## Civil Society Human and Institutional Development Program

Policy drafted: March 2024  
Policy Approved by CHIP Board of Directors: May 21, 2024

Complaints to be Received at: Phone #: +923325567677 Email: [complaint@chip-pk.org](mailto:complaint@chip-pk.org)  
CHIP House, Plot # 5, Street # 08, G 8/2, Islamabad, Pakistan

## TABLE OF CONTENT

<b>Introduction</b>	<b>3</b>
<b>Aims &amp; Scope of this Policy</b>	<b>3</b>
<b>The Policy</b>	<b>3</b>
<b>A. What should not be reported under this Whistle-blowing policy?</b>	<b>4</b>
<b>B. Responsibility for the Policy</b>	<b>4</b>
<b>C. Reporting a Case</b>	<b>4</b>
<b>D. Raising a Concern using the Whistle-blowing Mechanism</b>	<b>5</b>
<b>E. Confidentiality</b>	<b>5</b>
<b>F. Protection and Support for Whistle-blowers</b>	<b>6</b>
<b>G. Communicating of Investigation Outcomes</b>	<b>7</b>
<b>H. False Allegations</b>	<b>7</b>
<b>I. Right of Appeal</b>	<b>7</b>
<b>J. Notification</b>	<b>8</b>

## WHISTLE BLOWING POLICY

### Introduction

CHIP is committed to the highest possible standards of ethical and legal conduct. Consistent with this commitment, CHIP provides an avenue for employees and members of communities to raise concerns about suspected misconduct including sexual exploitation and abuse, dishonesty, and fraud by any staff member and to provide reassurance that they will be protected from reprisals or victimization for whistle-blowing in good faith.

The system provides a channel for reporting of suspected wrongdoing as quickly as possible, in the knowledge that concerns will be taken seriously and investigated appropriately and, in a way, which ensures that those who raise genuine concerns can do so without fear of reprisals.

This Policy applies equally to all team members at the Head Office and in field including project employees, community mobilisers, teachers, members of village education /health committee and members of communities CHIP is working in; are expected to comply with the provisions contained here.

### Aims & Scope of this Policy

This policy aims to:

- Encourage Whistle-blowers to feel confident about raising concerns about relevant wrongdoings;
- Provide avenues for Whistle-blowers to report relevant wrongdoings and receive feedback on any action taken;
- Reassure Whistle-blowers that they will be protected from reprisals for making a disclosure in accordance with this policy.
- Display the organizations commitment to honest practices, and responsible conduct of its employees, partners and stakeholders, and to recourse should these not be adhered to.

### The Policy

1. This Policy applies to all activities and operations of CHIP, including projects and programmes funded by donor partners as well as those implemented by partner organizations.
2. The policy encourages anyone to whom it applies to report wrongful acts committed by anyone involved in the activities and operations of CHIP.
3. The Whistle-blowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct.
4. This procedure does not replace other policies and procedures such as the CHIP Code of Conduct, the Anti-Fraud and Corruption, PSEA and other policies with specifically laid down statutory reporting procedures but will complement such procedures.
5. Wrongful acts in this sense may include, but are not limited to:
  - a. criminal activity;
  - b. failure to comply with any legal or professional obligation or regulatory requirements;
  - c. improper conduct or unethical behaviour;
  - d. danger to health and safety;
  - e. damage to the environment or office property;
  - f. bribery under the Organisation's Anti-Fraud and Corruption Policy;
  - g. financial fraud or mismanagement;
  - h. participation in or facilitation of criminal tax evasion
  - i. breach of the Organization's policies and procedures;
  - j. conduct likely to damage the Organization's reputation or financial wellbeing (or that of its

- subsidiaries);
  - k. Unauthorized disclosure of confidential information;
  - l. negligence;
  - m. harassment, bullying;
  - n. sexual harassment;
  - o. sexual exploitation and abuse
  - p. child or adult at risk abuse
  - q. modern slavery or trafficking
  - r. discrimination (e.g., against someone on the basis of their race or gender);
  - s. manager/employee relations;
  - t. abuse or excessive use of power;
  - u. abuse of trust;
  - v. fraudulent procurement;
  - w. undeclared conflict of interest;
  - x. the deliberate concealment of any of the above wrongful acts.
6. A Whistle-blower is any person who raises a bona fide or genuine concern relating to any of the above wrongful acts, which may or may not be explicitly covered in the policy, but which may nevertheless be considered a violation of “CHIP Code of Conduct”.
  7. Should a Whistle-blower acting in good faith face any direct or indirect victimization, including any form of retaliation, then disciplinary measures or further actions will be taken against any such victimizers or wrongdoers.
  8. Members of staff whilst still in the employment of the organization and community members are encouraged to report any wrongful act whenever possible.

#### **A. What should not be reported under this Whistle-blowing policy?**

- a. Complaints relating to personal circumstances in the workplace or to terms of employment (excluding the aforementioned wrongful acts listed above) should not be reported under the CHIP Whistle-Blowing Policy.
- b. While CHIP takes concerns relating to personal circumstances and terms of employment seriously, they should be raised with the appropriate authority handling such concerns, namely HR, by using the grievance procedure included within the CHIP Human Resource Manual.

#### **B. Responsibility for the Policy**

- a. The CHIP BoD has the overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- b. CHIP Senior Management Team (SMT) has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.
- c. Policy awareness sessions must also be carried out with all staff.
- d. SMT, in conjunction with the CHIP BoD should review this policy from a legal and operational perspective after every three years.

#### **C. Reporting a Case**

- a. All CHIP Staff and community members are encouraged to report wrongful acts or suspected wrongful acts in accordance with this Whistle-Blowing policy, and in line with CHIP Code of Conduct. Members of staff of partner organizations and community members may also report such wrongful acts committed by CHIP Staff or their own staff in the execution of their partnership agreements.
- b. Any employee of CHIP that of a partner organization or a community member who observes any improper practice or wrongful conduct on the part of a CHIP member of staff or of a partner organization should report such observations to one of the following:

## CHIP Whistle Blowing Policy March 2024

- Chief Executive Officer
  - Line Manager
  - HR Representative
  - Audit Committee
- c. In cases where alleged wrong doing relates to the CHIP Board, the case should be reported to the CEO and Manager HR.
- d. All reports should be properly investigated by a Committee set up by Head Office.
- e. The composition of investigation committees should be carefully considered, and allow for possible appeals, and as far as possible, appeals should be handled by the most senior representative of the organization.
- f. Complaints relating to Sexual Harassment, Exploitation and Abuse including child abuse and abuse of adults at-risk can be raised to the CHIP SHEA and Safeguarding Focal Point and/or ([complaint@chip-pk.org](mailto:complaint@chip-pk.org)). The PSEA Team must be informed of all concerns relating to PSEA. For more information please review the PSEA.

### **D. Raising a Concern using the Whistle-blowing Mechanism**

- a. Whistle-blowers are encouraged to raise their concerns under the CHIP Whistle- blowing policy within their respective section as a first option. However, it is also recognized that the Whistle-Blower may prefer to use an alternative mechanism for reporting an allegation (or, in the case of external parties or ex-employees, may not have access to those mechanisms). Therefore, this policy provides for reporting to the email address ([complaint@chip-pk.org](mailto:complaint@chip-pk.org)) as well.
- b. CHIP encourages Whistle-blowers to provide as much detail about their concern/s as possible, however at the same time, it is noted that it is not the Whistle-blower's role to investigate. Provision of the following information is recommended where possible:
- Provide a description of the alleged wrongdoing;
  - Where possible provide any existing information that supports the allegation (e.g.emails, photographs)
  - Date the disclosure;
  - Provide contact details for follow-up by CHIP on the concern raised. The details will be kept strictly confidential.

### **E. Confidentiality**

- a. Cases may be reported on a confidential basis or may be reported anonymously using the email address ([complaint@chip-pk.org](mailto:complaint@chip-pk.org)) or Phone # (+923325567677) which will be monitored by CEO.
- b. CHIP encourages both anonymous and open disclosures, however we note that investigations may be more difficult if there is a need to obtain further information in the case of an anonymous report.
- c. While every effort will be made to keep a Whistle-blowers' identity confidential, there may be circumstances in which it will be necessary to disclose an identity; this may occur in connection with associated disciplinary or legal investigations or proceedings.
- d. CHIP will work with Whistle-blowers to ensure that they receive information about their status under national law (for example, if their identity will need to be disclosed). Thus, the security of the Whistle-blower will be paramount.
- e. Whistle-blowers, who are concerned about possible reprisals if their identity is revealed, should come forward, after which appropriate measures will be taken to preserve confidentiality.
- f. If it is deemed necessary that the investigating party involved be informed of a Whistle blowers' identity, it will be discussed with the Whistle-blower in advance. CHIP hopes that individuals will feel able to voice Whistle-blowing concerns openly under this policy.

However, if the individual wishes to raise concerns anonymously CHIP will make every effort to keep their identity secret.

## **F. Protection and Support for Whistle-blowers**

- a. It is understandable that Whistle-blowers are sometimes concerned about possible repercussions emanating out of the complaints or concerns lodged. CHIP, therefore aims to encourage openness and will support staff and others who raise genuine concerns under this policy, even if such concerns turn out to be of a mistaken nature.
- b. No individual raising genuinely held concerns in good faith under this policy will be dismissed or be subject to any detrimental consequences arising from their actions such as unwarranted disciplinary action, victimization, threats or other unfavorable treatment.
- c. If any person/s is subjected to detriment as a result of making a disclosure, they should inform the appropriate authority immediately using the methods and channels as set out in this policy. If the matter is not remedied, they should raise it formally using CHIP's Head Office or Grievance Procedure where applicable.
- d. CHIP Staff must not in any way threaten or retaliate against Whistle-blowers. If any member of staff is found to be guilty of such conduct, that staff member will be subject to disciplinary action.
- e. If any CHIP staff member is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. It is important to note that if a case is not upheld that does not always mean that the complaint was false, but rather in some cases that there was insufficient evidence to uphold the allegation or complaint in question.
- f. Support will be offered to Whistle-blowers as appropriate, regardless of whether a formal response is carried out (e.g. an investigation). This may include specialist psycho-social counselling, medical support, legal support and/or access to other specialist and appropriate support as needed.
- g. Whistle-blowers can decide if and when they would like to utilize the support options available to them. CHIP is committed to taking Whistle-blowers guidance and concerns, where safe and appropriate, on board. In this regard, CHIP is furthermore committed to working with Civil Society and women's rights groups in ensuring that the support it offers to whistle-blowers are appropriately diverse in nature.

### **Handling of reported cases**

- a. Disclosures may, depending on the seriousness and nature of the allegations, be referred immediately to the appropriate authorities concerned e.g., the police. Likewise, if urgent action is required (for example to remove a health and safety hazard) such action will be taken before any other investigation is conducted. Risk assessments will subsequently be carried out throughout the process to ensure the safety and wellbeing of everyone involved.
- b. All concerns raised will be responded to. In order to ensure natural justice and prevent malicious allegations, an initial inquiry will be made to decide whether an investigation is appropriate, and if so, what form it should take. Where appropriate, the matters reported may:
  - i. Be investigated by SMT; cases relating to PSEA and Safeguarding will be managed by the PSEA Focal Point; cases relating to HR will be managed by the HR representative.
  - ii. Be referred to external enforcement agency or regulator in country;
  - iii. Form the subject of an independent (third party) inquiry;
  - iv. For cases that involve more than one kind of wrongful act (e.g. a PSEA and Safeguarding concern alongside a fraud allegation) and/or that are high risk, a committee consisting of representatives from HR, PSEA and SMT will be convened to address the allegation in question. This process can be carried out at the Head Office level.
  - v. Be referred to a decision-making panel to review the outcome of the investigation and decide on appropriate corrective action

## CHIP Whistle Blowing Policy March 2024

- c. Within seven working days of receiving a report the appropriate role/team, CEO and SMT will:
- d. Where appropriate, indicate in summary form how the relevant investigating authority proposes to deal with the matter;
- e. Where necessary, give an estimate of how long it will take to provide the next response and or when investigative updates will be provided; or if possible, provide an approximate date by which the Whistle-blower will receive the final communication; or set out why no investigation will take place.
- f. Where allegations are received at Head Office level, cases will be properly investigated by the SMT, where applicable.
- g. Reported cases may also be investigated by the SMT, where appropriate (for example, if a case has escalated as outlined above).
- h. Upon investigation, management and or a decision-making panel will take the appropriate corrective action necessary as per the investigative outcome.

### **G. Communicating of Investigation Outcomes**

#### Internal Communication

- a. The CEO should be notified of the outcome of an investigation which took place at Head Office level.
- b. For investigations carried out by the SMT, a report will be communicated to a higher authority as appropriate and corrective actions will be suggested.
- c. The CEO together with the respective managers must be notified as part of the internal communication as well.
- d. A higher reporting authority may include the Management Committee of the CHIP Board.

#### External Communication

- a. In some circumstances, it may be necessary to notify external bodies such as donors and regulators of an allegation when it is initially reported and on the outcome of the investigation, once it is finalized.
- b. In these instances, the CEO with the respective manager will manage the communication to the respective donors and regulators as per the relevant contractual requirements.
- c. The Whistle-blower will also be notified of the outcome of an investigation whenever it is feasible to do so.
- d. On an annual basis, and on a case by case basis as needed, concerns raised through the above Whistle-blowing process will be tracked and reported to the Management Committee of CHIP Board.

### **H. False Allegations**

Any false allegation/s which proves to have been made maliciously or with a view to personal gain will be viewed as a serious disciplinary offence and may result in disciplinary action.

### **I. Right of Appeal**

1. Persons are entitled to appeal in this process following any decision arising from the assessment stage or investigation stage of the process.
2. Notice of appeal shall be in writing and must be submitted within 5 working days of the decision to the relevant investigating body.

3. The appeal for cases reported at Head Office level will be referred to SMT and the BoD Management Committee. No person presiding over an appeal will have been involved at any stage of the assessment or investigation stages of the process.

## **J. Notification**

1. All departmental heads and in particular human resource representatives are required to notify and communicate the existence and contents of this policy to the employees of their department and to all new employees respectively.
2. CEO is responsible for creating a working culture that enables staff and others to raise concerns. The senior managers should accordingly also ensure that partners with whom project Memorandum of Understandings have been signed with are made aware of this policy and the partners responsibility to report any wrongful conduct of CHIP Staff in the execution of their duties.
3. This policy will be monitored and reviewed for its effectiveness every three years.

<b>Whistle-blowing Helpline</b>	<b>Contact Details</b>
Operations and HR	(complaint@chip-pk.org) <u>Tel : +923325567677</u>