

Whistle blowing policy

Effective June 2008

Introduction

The ActionAid whistle-blowing system aims to reinforce the organisation's commitment to its policies, values, attitudes and behaviours. The system provides an alternative channel to other reporting systems to learn of serious problems so that they can be resolved quickly.

Policy

This policy applies to all staff of ActionAid and those of partner organisations who are in a long-term (over one year) relationship with ActionAid. The policy covers the responsibility to report wrongful acts committed by staff of ActionAid and those of partner organisations. Wrongful acts in this sense are described as;

Financial and procedural malpractice including those relating to mismanagement, misappropriation of funds, actual or suspected fraud or abuse of authority.

Under this policy, it will be a disciplinary matter if a genuine whistleblower were to be victimised. While the policy does not specifically cover ex-employees of the organisation, reports received from ex-employees will be considered for investigation. Members of staff are however encouraged to report any wrongful act whilst still in the employment of the organisation.

Reporting responsibility

It is an obligation for all ActionAid staff to report wrongful acts or suspected wrongful acts in accordance with this Whistle-Blowing policy. Members of staff of partner organisations are also required to report such acts committed by ActionAid staff or their own staff in the execution of

their partnership agreements. Reports can be made as follows;

- **Affiliates, Associates and Country Programmes**
Any employee of ActionAid or that of a partner organisation who observes any improper practice or wrongful conduct on the part of an ActionAid member of staff or of a partner organisation should report such observations to the Country Director.

Where the alleged wrongdoing relates to the conduct of the Country Director, the case should be reported to the International Director responsible for the Country.

- **International Secretariat**
Any employee of ActionAid who observes any improper practice or wrongful conduct at any Regional Office or the International Secretariat should report such cases to the International Director responsible for that office.

Where the alleged wrongdoing relates to the conduct of an International Director, the case should be reported to the Chief Executive Officer.

Where the alleged wrongdoing relates to the conduct of the Chief Executive Officer, the case should be reported to the Head of Internal Audit.

Confidentiality

Cases may be reported on a confidential basis or may be reported anonymously using the email address whistleblowing@actionaid.org which will be monitored by Lanre Amao, Head of Internal Audit. He can also be contacted on +27 11 731 4500.

The confidentiality of the reports will be kept to the extent possible, consistent with the need to conduct an adequate investigation.

Country Directors should also ensure that long-term partners are made aware of their responsibility to report any wrongful conduct of ActionAid staff in the execution of a partnership agreement.

Handling of reported cases

The Country Director, Head of Internal Audit or a member of the International Directors' team who receives a report will acknowledge receipt of the report within seven business days.

All reports should be properly investigated by a Committee set up by management or an internal auditor where applicable. Reported cases may also be passed to the international internal audit team for investigation, if considered appropriate.

Upon investigation, management should take the appropriate corrective action warranted by the outcome of the investigation.

The Head of Internal Audit and the Regional Finance Coordinator should be notified of the outcome of an investigation.

For investigations carried out by the international internal audit team, a report will be made to higher authority as appropriate and corrective actions will be suggested.

There may be occasions when external bodies such as donors and regulators (Charity Commission) will be notified of the outcome of an investigation.

The Whistle-blower would also be notified of the outcome of an investigation whenever it is possible to do so.

On an annual basis, issues raised through whistle-blowing will be tracked and reported to the Board.

False Allegations

Any allegation which proves to have been maliciously or knowingly false will be viewed as a serious disciplinary offence. Any personal interest should be made known when first raising concerns.

Notification

All departmental heads and in particular human resource managers are required to notify and communicate the existence and contents of this policy to the employees of their department and all new employees respectively.