

Mandatory Policies	Date Issued:
	Date Revised: February 2022
Sub Section: Whistleblowing Policy and Procedure	Index Number :
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Purpose of the Policy

This Policy encourages and support employees and others to come forward and voice serious concerns about any aspect of TISL operations without fear of victimization, discrimination or disciplinary action from TISL. Whistleblowing is viewed by TISL as an important practice in the fight against corruption.

x.1 Whistleblowing

Whistleblowing means the disclosure of suspected misconduct, illegal acts or failure to act within TISL code of conduct, policies and procedures by TISL staff members, TISL's partners' and board members.

Raising Concerns

Any serious concerns that;

- Make you feel uncomfortable
- Are not keeping in line with TISL's code of conduct and policies
- Are inappropriate actions or behaviors

This may include:

The abuse (physical, sexual or verbal) or bullying of TISL clients / beneficiaries, staff members or partners' staff members.

The sexual harassment or discrimination or other inappropriate behavior towards TISL Clients / beneficiaries, staff members and partner staff members.

Fraud, corruption, bribery or blackmail.

Aid diversion (such as terrorism financing), money laundering, facilitating tax evasion or other financial irregularities.

Putting the health and safety of individuals, including beneficiaries, staff members or partners' staff members at risk.

Committing a criminal offence, or engaging in illegal activities or failing to comply with the law.

Damaging the environment, misuse of TISL's property.

Gross injustice within TISL.

Personal data breaches.

Any breach of TISL's Code of Conduct.

Deliberately concealing any of the above matters.

Whistleblower is a person who raises a genuine concern relating to any of the above and could be an internal or external party.

It is not disloyal to colleagues or towards TISL to speak up against inappropriate behavior or action. TISL is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices.

If you are considering raising a concern you should be clear on:

- The type of issues that can be raised and to whom it should be raised
- How the person raising a concern will be protected from victimization and harassment
- How to raise a concern

x.2 Aim of this Policy

It is intended to encourage and enable to raise serious concerns on TISL or it's staff conduct, rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to;

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice.
- Provide avenues for you to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible victimization if you have made any disclosure in good faith.

x.3 Scope of this Policy

This policy is to provide an internal mechanism for reporting, investigating and remedying any inappropriate action or behavior within TISL. Staff are encouraged to immediately report internally and to maintain confidentiality of the facts to support the investigation process. We strongly encourage any member of staff to seek advice before reporting a concern to anyone external. This policy does not replace any existing policies at TISL.

Whistle Blowing could be related to board members, employees, interns, consultants, contractors, partners, volunteers, casual workers, any other related person regardless of seniority or length of service.

This policy does not form part of any employee's contract of employment and we may amend it at any time.

x.4 Principles

This policy offers guidance and protection to those members of staff who disclose a whistleblowing concern.

The wellbeing of any member of staff will not in any way be harmed, whether the concern reported proves to be true or not, provided the reporting is carried out in good faith.

TISL undertakes to comply with all applicable laws relating to the prohibition of retaliation against good-faith whistleblowers who raise issues of concern.

x.4.1 Protecting the whistleblower

TISL will not dismiss anyone or allow them to be victimized for the reason of raising a concern, unless the investigation proves that the party who raised the concern has taken part in the violation or inappropriate action.

The Whistleblower will be given full support from the senior management concerns will be taken seriously.

For those who are not TISL staff, TISL may provide appropriate advice and support wherever possible.

x.4.2 Confidentiality

Confidentiality will be maintained in relation to all concerns raised and every effort will be made not to reveal the identity of the whistleblower, if that is not requested. But, if disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the disclosure without revealing the complainant. In such instances, whistleblower may be asked to come forward as a witness. Advice and support will be provided as necessary.

X.4.3 Anonymous Allegations

It is encouraged to raise a concern with a name as much as possible and with available evidence. Concerns raised anonymously are much less effective.

When analyzing an anonymous complaint, the following points would be carefully reviewed:

- the seriousness of the issue raised
- the credibility of the concern
- the likelihood of confirming the allegation from other sources

x.4.4. False Allegations

In the event a complaint is made with good faith, reasonably believing it to be true, but later found to be not true based on the investigations or facts, the complainant will not be penalized in any way. But, concern raise maliciously or for personal gain may result in disciplinary action.

x.5. Reporting Procedure

When to report a concern

TISL encourages all staff members to report any instance which they reasonably believe may be of concern as soon as they find out about them, even if the incidents happened a while ago. TISL staff members should also report if they have a genuine concern that a suspected wrongdoing or dangerous practice is likely to occur but has not happened yet.

Depending on the nature of the concern, the reporting channel may vary. In the first instance, staff members should consider reporting to their line manager. If the concern relates to your own treatment as an employee, raise it to the immediate line manager or Senior Manager Human Resources or Executive Director following the existing **grievance or harassment procedures**.

Concerns from a client about services provided to him/ her: raise as a complaint to the **Executive Director**.

Concerns on inappropriate behavior or fraud, bribery or misappropriation of resources raise it to the Executive Director following the **Anti-corruption policy**.

If you are not comfortable or able to report following the given reporting channel, you may also report it to the Chairperson of the Board of Director.

Concerns can be raised verbally or in writing. Verbal complaints are taken in instances where complainant is not in a position to write. But, the statement will be recorded by the hearing party and signature will be obtained.

Anonymous complaints are not encouraged. When raising a concern you need to understand;

- Nature of your concern and why you believe it to be true
- Background and history of the concern

Upon Receiving a complaint, the above mentioned recipients should:

- Acknowledge that the concern has been received
- Indicate how TISL will deal with the matter
- Provide information on staff support mechanisms.
- Inform whether further investigations will take place and if not, the reasons.

X.6 Investigation

TISL will respond to any reported concerns as quickly as possible.

The investigation may need to be carried out under terms of strict confidentiality, i.e., by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases, however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the police
- be referred to the external auditor
- be referred and put through established child protection/abuse procedures
- form the subject of an independent inquiry

Upon receiving the complaint and available evidence TISL will;

- a) assess the report of Reportable Conduct.
- b) consider whether there are any conflicts of interest prior to investigating.
- c) determine whether external authorities need to be notified.
- d) determine whether and how to investigate.

If an investigation is deemed necessary, it will be conducted fairly, objectively and in a timely manner. The investigation process will vary depending on the nature of the Reportable Conduct and the amount of information provided.