

[ORGANISATION NAME]

Whistleblower Policy

Speaking up about wrongdoing — protections, channels and process

Policy owner	[Title — e.g. Board Audit & Risk Committee]
Approved by	[Board of Directors / Trustees], on [date]
Effective date	[Date]
Version	[1.0]
Next review	[Date — recommended every two years]
Applies to	All country offices, programmes and affiliates of [ORGANISATION]

1. Purpose

[ORGANISATION] is committed to the highest standards of integrity, transparency and accountability in every country where it works. This policy exists so that anyone who becomes aware of suspected wrongdoing connected to our operations can report it safely, and so that the organisation responds promptly, fairly and consistently.

The policy has three aims:

- To encourage people to raise serious concerns early, rather than waiting for harm to occur or reporting externally without giving us the chance to act.
- To protect anyone who reports a concern in good faith from retaliation of any kind.
- To set out clearly how concerns will be received, assessed, investigated and closed.

2. Scope

This policy applies to all of [ORGANISATION]'s operations worldwide, including headquarters, country and field offices, and affiliated entities. It covers reports made by:

- Employees, at any level and in any country, including those on fixed-term or local contracts
- Board members, officers and volunteers
- Interns, fellows, secondees and agency staff
- Consultants, contractors, suppliers and implementing partners
- Programme participants, beneficiaries and members of communities where we work
- Former personnel and job applicants

Local law. Where the law of a country in which we operate gives a person greater protection or wider reporting rights than this policy, that law prevails. Where local law appears to conflict with this policy, the Whistleblowing Officer will seek legal advice before any action is taken, and no person will be asked to act unlawfully.

What this policy is not for. Personal grievances about your own employment — pay, workload, performance reviews, day-to-day interpersonal conflict — are handled under the Grievance Policy, not this one. If you are unsure which applies, raise it anyway; we will route it correctly.

3. What to report

A reportable concern is any reasonable suspicion of wrongdoing, malpractice or serious risk connected to [ORGANISATION], its personnel, its funds or its partners. This includes but is not limited to:

- Fraud, theft, embezzlement, or misuse or misappropriation of organisational or donor funds and assets
- Bribery, kickbacks, facilitation payments, or corruption in procurement, recruitment or the award of grants and sub-awards
- Conflicts of interest that are undisclosed or improperly managed, including self-dealing and nepotism
- Sexual exploitation, abuse or harassment; safeguarding failures involving children or adults at risk
- Discrimination, bullying, harassment or abuse of authority
- Deliberate falsification of programme results, financial records, research data or donor reports
- Breach of donor conditions, sanctions, counter-terrorism financing rules or anti-money-laundering obligations
- Danger to the health, safety or security of staff, partners, participants or communities
- Serious damage to the environment
- Breach of law, regulation or [ORGANISATION]'s Code of Conduct
- Deliberate concealment of any of the above

You do not need proof. You need only a reasonable, honestly held belief that something is wrong. It is not your job to investigate or to gather evidence before reporting — doing so may compromise a later investigation. Report what you have seen or been told, and let the process establish the facts.

4. Protection from retaliation

[ORGANISATION] will not tolerate retaliation against anyone who reports a concern in good faith, cooperates with an investigation, or refuses to participate in wrongdoing. This protection applies regardless of whether the concern turns out to be substantiated.

Retaliation includes, among other things:

- Dismissal, non-renewal of a contract, demotion or suspension
- Withdrawal of duties, transfer, or exclusion from meetings, travel or opportunities
- Unjustified negative performance appraisal or disciplinary action
- Reduction of pay, benefits or hours
- Harassment, intimidation, ostracism or damage to reputation
- Termination or non-renewal of a partner, supplier or consultancy agreement
- Threats to immigration status, visa sponsorship or accommodation

Retaliation is itself a disciplinary offence under this policy and may lead to dismissal or termination of contract. Anyone who believes they have suffered retaliation should report it immediately through any channel in section 6; it will be treated as a fresh reportable concern.

Burden of proof. Where a person who has reported a concern suffers a detriment within [12] months of reporting, [ORGANISATION] will presume the detriment is connected to the report unless the responsible manager can demonstrate a clear, documented and independent reason for it.

Protection is not immunity. Reporting a concern does not shield a person from the consequences of their own misconduct. However, voluntary and early disclosure of one's own involvement will be taken into

account as mitigation.

5. Confidentiality and anonymous reports

The identity of a person who reports a concern will be treated as confidential and disclosed only to those who need to know in order to assess or investigate the matter, or where disclosure is required by law or by a regulator. Wherever disclosure becomes necessary, the reporter will be told first and the risks discussed with them.

Anonymous reports are accepted and will be assessed on the same criteria as any other report. Be aware that anonymity can limit how far an investigation can go, since follow-up questions may not be possible. If you report anonymously, consider using the external hotline, which can pass on questions and answers without revealing who you are.

The identity of the person a report is about is equally confidential. Nobody should be assumed to have done anything wrong until an investigation has concluded.

6. How to report

Use whichever channel you are most comfortable with. You are not required to report to your line manager first, and you may go directly to the Board if the circumstances warrant it.

Channel	Contact	Use when
Line manager or country director	In person or by email	The concern is local and does not involve your management chain
Whistleblowing Officer	[name] · [email] · [phone]	Default channel for most concerns
Independent external hotline	[provider] · [web form] · [toll-free numbers by country]	You want to report anonymously or outside the organisation
Chair of the Board / Audit Committee	[email]	The concern involves senior management or the Whistleblowing Officer
Safeguarding Focal Point	[name] · [email]	The concern involves harm to a child or adult at risk, or sexual exploitation or abuse

Reports may be made in any language in which [ORGANISATION] works; translation will be arranged at the organisation's cost. Where possible, include what happened, who was involved, when and where it occurred, and whether anyone is at immediate risk.

External reporting. Nothing in this policy, and no contract, settlement or confidentiality agreement, prevents any person from reporting wrongdoing to a regulator, law enforcement agency, donor or court where they are entitled to do so. We ask only that you consider raising it internally first where it is safe and reasonable to do so.

7. How reports are handled

1. Acknowledgement — the Whistleblowing Officer acknowledges receipt within [5] working days, unless the report is anonymous and no contact route exists.
2. Immediate risk assessment — if anyone is at risk of harm, protective action is taken at once, before any investigation begins. Safeguarding concerns are referred simultaneously to the Safeguarding Focal Point.

3. Preliminary assessment — within [15] working days the Officer decides whether the matter falls under this policy, whether it requires investigation, and whether any conflict of interest requires the matter to be handled externally.
4. Investigation — conducted by a person independent of the matter, who may be internal or external. The subject of the report is informed and given a fair opportunity to respond, unless doing so would prejudice the investigation or endanger anyone.
5. Outcome — findings are reported to the Whistleblowing Officer and, for serious matters, to the Board Audit and Risk Committee. Substantiated wrongdoing leads to disciplinary action, contract termination, recovery of funds, referral to authorities, or a combination of these.
6. Feedback — the reporter is told the outcome in general terms and what action has been taken, so far as confidentiality, data protection law and the rights of others allow.
7. Donor and regulatory notification — where donor agreements or law require it, the incident is reported to the relevant donor, regulator or authority within the required timeframe.

Investigations will be completed as quickly as the circumstances allow, and normally within [90] days. Where more time is needed, the reporter will be told and given a revised timeframe.

8. Reports made in bad faith

A report that turns out to be mistaken carries no consequence, provided it was made honestly. Deliberately false or malicious reports, made to harm a colleague or to serve a personal interest, are a disciplinary offence. The bar is high: bad faith must be demonstrated, not merely suspected because a concern was not substantiated.

9. Roles and responsibilities

The Board

Owns this policy, receives a report on all serious concerns and on the operation of the policy at least annually, and ensures the Whistleblowing Officer can act independently of management.

Whistleblowing Officer

Receives and logs all reports, conducts the preliminary assessment, commissions investigations, monitors reporters for signs of retaliation, and maintains the register. Reports directly to the Board Audit and Risk Committee on matters involving senior management.

Managers and country directors

Must pass any concern raised with them to the Whistleblowing Officer without delay and without conducting their own enquiry. Must not attempt to identify anonymous reporters, and are accountable for ensuring no retaliation occurs in their team.

All personnel and partners

Must report concerns they become aware of, cooperate fully and honestly with investigations, and keep the existence and content of a report confidential.

10. Records and data protection

The Whistleblowing Officer maintains a confidential register of all reports, decisions and outcomes, held securely with access restricted to the Officer and the Board Audit and Risk Committee. Records are retained

for [7] years from closure, or longer where litigation or donor requirements demand it, and are then securely destroyed.

Personal data collected under this policy is processed in accordance with applicable data protection law, including the GDPR where relevant, and used only for the purposes of assessing and investigating the concern.

11. Communication and training

This policy is translated into the working languages of all country offices, provided to every person on joining, covered in induction and refreshed at least every [two] years. It is published on [ORGANISATION]'s website so that partners, communities and members of the public can use it. Reporting channel details are displayed in all offices and project sites.

12. Related policies

- Code of Conduct
- Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- Anti-Fraud, Bribery and Corruption Policy
- Conflict of Interest Policy
- Grievance and Disciplinary Procedures
- Data Protection and Records Retention Policy

13. Review

The Board reviews this policy every [two] years, or sooner following a significant incident, a change in law in a country of operation, or a donor requirement.

Acknowledgement

I confirm that I have read and understood [ORGANISATION]'s Whistleblower Policy, that I know how to raise a concern, and that I understand I will be protected from retaliation for doing so in good faith.

Name: _____ Position: _____

Signature: _____ Date: _____

Drafting note: text in square brackets should be completed or confirmed before adoption. This template is a starting point and should be reviewed against the employment and whistleblowing law of each country of operation, and against donor compliance requirements, before the Board approves it.