



**INTEGRATION FOR PEACE & HOPE
RESTORATION UGANDA**

Whistleblowing Policy

Guidelines and principles

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Introduction

IPHR Uganda is committed to the highest standards of openness, honesty, transparency and accountability. We acknowledge that all organizations face the risk of their activities going wrong from time to time, or of unknowingly harboring malpractice. We believe we have a duty to take appropriate measures to identify such situations and attempt to remedy them. One important aspect of accountability and transparency is a mechanism to enable staff and other members of the organization to voice concerns in a responsible and effective manner. On this basis, staff and volunteers are encouraged to raise genuine concerns about malpractice in the workplace without fear of reprisals and IPHR Uganda will protect them from victimization and dismissal. There will be arrangements to enable this to be done independently of line management.

What is whistleblowing?

In this Policy 'Whistleblowing' refers to reporting by employees of suspected misconduct, illegal acts or failure to act within the IPHR Uganda Mandate. The main aim of this Policy is to encourage employees and other members such as volunteers and consultants who have serious concerns about any aspect of IPHR Uganda work to come forward and voice those concerns.

If staff or other members of the organization are considering raising a concern, there is a need to have Policy that can assist the concerned staff. The policy explains:

- a) the types of issues that can be raised,
- b) how the person raising a concern will be protected from victimization and harassment,
- c) how to raise a concern, and what IPHR Uganda will do upon receipt of a concern.

It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the organization nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside IPHR Uganda

What is Not Whistleblowing?

Whistleblowing is not the same as a complaint or raising a grievance where the individual is saying that they have personally been poorly treated. This policy does not apply to complaints of staff associated with unsatisfactory probation

reports, performance evaluations, discriminatory work assignments, equal employment opportunities, sexual harassment or any other personal grievances. These shall be referred to the Human Resources Department and other mechanisms established by IPHR Uganda for such grievances. However, where in the view of the Whistle blower, factors such as probation reports, performance evaluations, work assignments and opportunities or any form of harassment is being used by management in a retaliatory manner, the policy shall apply.

Scope of the policy

This Policy is intended to enable those who become aware of wrongdoing in IPHR Uganda affecting some other person or program, to report their concerns at the earliest opportunity so that they can be properly investigated. This policy is designed to enable employees of IPHR Uganda to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety.

These concerns could include;

- Financial irregularities, malpractice or impropriety or fraud,
- Failure to comply with a legal obligation,
- A health and safety risk to an individual,
- A criminal offence which has been committed or is about to be committed,
- A miscarriage of justice has occurred or is occurring,
- Improper conduct or unethical behavior,
- Attempts to conceal any of above. Examples of this include corruption, bribery, criminal activities or abuse.

The Whistleblowing Policy is not intended to replace existing procedures and should only be used when existing procedures could not address them as senior management is not aware of the concern or line managers are a party to it.

What needs to be reported?

Any serious concerns about program and operations or the conduct of staff members of IPHR Uganda or others acting on behalf of IPHR Uganda that:

- make one feel uncomfortable in terms of known standards;
- are not in keeping with IPHR Uganda policies and procedures;
- fall below established standards of practice; or are of improper behavior.

These might relate to (the list is not exhaustive):

- Conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation).
- Disclosures related to miscarriages of justice.
- Tribal, racial, sexual, disability or other discrimination.

- Health and safety of the public and/or other employees.
- Damage to the environment.
- Unauthorized use of organization funds or other assets for personal gains.
- Possible fraud and corruption.
- Abuse of beneficiaries, or Other unethical conduct.
- The concealment of any of the above.

Safeguards

Protection of the whistle blower

This policy is designed to offer protection to those employees of IPHR Uganda who disclose such concerns provided the disclosure is made in good faith and in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person.

It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to disciplinary or legal action on the part of the persons complained about.

Confidentiality

IPHR Uganda will treat all such disclosures confidentially and sensitively. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of IPHR Uganda

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

Untrue Allegation

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the

information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Raising a concern

Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. A staff should normally raise concerns with:

- a) The Sector Head.
- b) IPHR Uganda Executive Director
- c) Chair of the national Board.

How to raise a concern?

A concern can be raised by telephone, in person or in writing. The earlier the concern is expressed, the easier it is to take action. The following information needs to be provided:

- the nature of the concern and why one believes it to be true.
- the background and history of the concern (giving relevant dates).

It is important to demonstrate to the person contacted that the whistle blower is acting in good faith and there are reasonable grounds for the concern.

It will be considered a serious disciplinary offence to:

- Deter anyone from using the whistleblowing procedure, Victimize or bully anyone using the whistleblowing policy,
- Concealing or destroying information about wrongdoings.

What IPHR Uganda will do

IPHR Uganda will respond to concerns raised as quickly as possible. In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

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:

- a) Be investigated by management, internal audit, or through the disciplinary/grievance process.

- b) Be referred to the external auditor.
- c) Be referred to the police.
- d) Form the subject of an independent inquiry.

Within ten working days of a concern being raised, the person investigating the concern will write to whistle blower:

- a) Acknowledging that the concern has been received.
- b) Indicating how IPHR Uganda proposes to deal with the matter.
- c) Supplying the whistleblower with information on staff support mechanisms.
- d) Telling the whistleblower whether further investigations will take place and if not, why not.

The amount of contact between the whistle blower and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that the whistleblower will be interviewed to ensure that his/her disclosure is fully understood.

Any meeting can be arranged away from the workplace, if the whistleblower wishes, and a fellow staff member or a friend may accompany him/her in support.

IPHR Uganda will do what it can to minimize any difficulties that the whistleblower may experience as a result of raising a concern. For instance, if the whistleblower is asked to give evidence in criminal or disciplinary proceedings,

IPHR Uganda will arrange for the whistleblower to receive appropriate advice and support.

The whistleblower needs to be assured that his/her disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, the whistleblower will be kept informed of the progress and outcome of any investigation.

The Responsible officer (Authority)

Authority for Whistleblowing Policy Overall for this policy sits with the Executive Director. The Executive Director has overall responsibility for the maintenance and operation of this Policy, and to ensure that staff and volunteers feel able to raise concerns without fear of reprisals, in

accordance with the procedure and guidelines set out herein. To facilitate this process, managers will be given training on the relevant operational framework and best practice.

HR Department staff has a duty to ensure this policy is widely circulated and all staff are aware of the policy and its procedures.

All staff and volunteers are responsible for the success of this policy and should ensure that they take steps to disclose any wrongdoing or malpractice of which they become aware.

How the matter can be taken further.

This Policy is intended to provide concerned staff with an avenue within IPHR Uganda to raise concerns. IPHR Uganda hopes the whistleblower will be satisfied with any action taken. If he/she is not, and feels it is right to take the matter outside the IPHR Uganda Management, it is advisable that the issue is taken to the country National Board.

- Chair, IPHR Uganda National Board
- If the whistle blower still feels it is right to take the matter outside IPHR Uganda, the following are prescribed contacts:
 - The External Auditor (contact details with Regional HRM and Country HR Officers of the respective country offices).
 - Other relevant bodies prescribed by legislation – IPHR Uganda HR Manager will be able to advise the whistleblower who to contact in the government.
 - The police.

If the whistleblower raises concern outside IPHR Uganda, he/she should ensure that it is to one of these prescribed contacts above. A public disclosure to anyone else is hereby prohibited.

The whistleblower should not disclose information that is confidential to IPHR Uganda or to anyone else, such as a donor or partner, except to those included in the list of prescribed contacts.

This Policy does not prevent the whistleblower from taking his/her own legal advice.

DECLARATION

I have received AAH-I's Whistleblowing Policy, which I have read and understood.

NAME: _____ POSITION.....

SIGNED: _____ DATE.....

Please return this page to Human Resources

POLICY APPROVAL

Following deliberation by the board on the Whistle blowing Policy , and other related policies held on this day 05/12/2022 in Kampala.

I, Namaganda Hadija as the Executive Director, and Secretary to the board of Directors for Integration and Katongole Sulaiman Chairperson Board of Directors for Peace and Hope Restoration Uganda do here by submitting the above policy documents for approval by the board members.

Name



Namaganda Hadija

Executive Director



Name



Katongole Sulaiman
Chair Person B.O.D