



IECE

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INTEGRATED EDUCATION FOR COMMUNITY EMPOWERMENT (IECE)

WHISTLE BLOWING POLICY

Administrator:	Executive Director
Approved by:	Board
Date of approval:	30 /11/2020
Date of next review:	2023
Language:	English
Applicable to:	All IECE staff, IECE Beneficiaries, IECE Associates, IECE Suppliers, IECE partners and Donors.
Related policies:	IECE Human Resource Policy IECE Harassment and Discrimination Policy IECE Whistle blowing policy
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IECE WHISTLE BLOWING POLICY

1. Purpose

IECE strives to conduct its work in accordance with IECE values and to uphold the global standards. However, all organizations face the risk of things going wrong or of unknowingly harboring illegal or unethical conduct. A culture of transparency and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

IECE encourages its staff, partners, beneficiaries, and other stakeholders to report non-compliance with IECE *Code of Conduct*, and especially any perceived instances of malpractice. This *Whistleblowing* policy aims to: -

- i. Encourage and enable Whistleblowers to report suspected wrongdoing within IECE as soon as possible, in the knowledge that their concerns will be taken seriously and investigated where appropriate, and that their confidentiality and, if desired, anonymity will be respected
- ii. To provide Whistleblowers with a safe, effective and accessible procedure for how to raise Whistleblowing Concerns
- iii. To reassure Whistleblowers that they should be able to raise genuine concerns regarding the conduct described below without fear of retaliation or reprisals, even if they turn out to be mistaken.

2. Application and Scope

This policy covers all part or full time staff working for IECE, as well as all volunteers, advisors, or consultants: who for the purpose of this document are all referred to as "STAFF". It also covers partners, business partners such as suppliers, service providers etc., other stakeholders like donors, local authorities or beneficiaries, as well as the general public.

Nothing contained herein is intended to provide any Whistleblower with any additional rights or causes of action, other than those provided by law. IECE reserve the right to amend this policy at any time.

3. Definition

"*Malpractice*" for the purposes of this policy may include but is not limited to: fraud, corruption, criminal offenses, non-disclosure of a conflict of interest, or the abuse of power — including sexual exploitation.

"Whistleblower" is a member of Staff or Volunteer or any other person who raises a genuine concern relating to any of the above ("Whistleblowing Concern") that they reasonably believe to be true.

4. Roles and Responsibilities

All Staff and Volunteers shall be responsible for:

- a. Reporting any Whistleblowing Concerns they may have in accordance with the reporting procedure described below, as IECE may amend in its discretion.
- b. Assist in any investigations of Whistleblowing Concerns by making available all relevant information and by cooperating in interviews.

All Managers are responsible for:

- a. Ensuring that the principles of this policy are communicated and understood throughout their teams.
- b. Escalating any reports of Whistleblowing Concerns they may receive to the appropriate Policy Administrator.

5. Procedure for raising a concern

- **IECE staff:** If you believe that the actions of any staff member, or person(s) having to do with IECE could constitute malpractice, you should raise your concerns with your line manager. If you do not feel comfortable speaking to your line manager for any legitimate reason or because you fear negative personal consequences for yourself such as reprisal, victimization, or dismissal, you may contact the line manager's direct superior.
- **Partners, business partners, beneficiaries and all other stakeholders:** You should raise your concerns with the Executive Director (complaints@iefce.org).
In exceptional circumstances where it would be inappropriate to approach either the IECE Executive Director you may raise the matter directly with the Board. Complaints to the Board may be raised via email (iececomplaints@iefce.org).
Please always include full details of the issue raised along with your concern, and any available supporting evidence. While addressing a complaint to the Board, please give a brief reason why the Executive Director cannot deal with the issue and state whether you wish your identity to be kept confidential.
For other complaints referring to issues that do not constitute malpractice in the above sense, IECE grievance procedures should be followed.

6. Handling of disclosures

All disclosures will be taken seriously, and processed using the following procedure:

1. In case a disclosure is made to a manager and the issue raised falls into his or her area of responsibility, the manager has the duty to acknowledge receipt of the complaint, assess or investigate the matter, provide necessary protection to the person raising the concern, and take appropriate action to end the alleged malpractice. If the manager considers the issue to be outside their area of responsibility, they are required to pass the issue to the Executive Director or Board as may be required.
2. If you have any personal interest in the matter you have raised, you must disclose this at the outset.

3. Any disclosure made under this policy will be acknowledged in writing to confirm that IECE will investigate the matter, and will reply to your concerns in due course.
4. The reported cases will be investigated and dealt with independently, objectively, and confidentially.
5. Assessment, clarification or investigation of the issue raised should begin within two weeks of the disclosure being made. The duration and scope of the assessment or investigation will depend on its subject matter. In most instances, there will be an initial assessment to determine whether there are grounds for a more detailed investigation, or whether the disclosure is, for example, based on erroneous information.
6. Any investigative activity will be carried out without regard to a person's relationship with IECE their position, or length of service.
7. You may be asked to provide further information during the course of the initial assessment of your disclosure, or during the investigation.
8. Following investigation, appropriate action will be taken — this could involve initiating a disciplinary process, or informing external authorities if a crime has been committed.
9. If it is found that there is insufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for IECE to take an alternative approach to dealing with the matter.
10. You will receive written notification from the persons handling the case of the outcome of the assessment or investigation.

7. Confidentiality:

Whistleblowers should feel comfortable reporting Whistleblowing Concerns openly under this Policy. Reports of Whistleblowing Concerns will be treated with the utmost confidentiality by all parties involved or otherwise aware of what has been reported, subject to any disclosures required as part of any regulatory process or legal proceedings, about which the Whistleblower will be advised where possible prior to disclosure where possible.

Although not prevented from doing so, Whistleblowers are encouraged not to make anonymous disclosures since proper investigation may be prevented if investigators cannot clarify or obtain further information from the Whistleblower. Inability to obtain follow-up information from a Whistleblower may lead to the closure of the process. Whistleblowers who are concerned about possible retaliation or reprisals if their identity is revealed should make this clear when making a complaint.

8. Protection for whistleblowers

IECE is committed to protecting members of Staff and Volunteers who make disclosures under this Policy. Any member of Staff or Volunteers who retaliates against a Whistleblower or in any way causes a Whistleblower to suffer adverse employment consequences as a result of their report is subject to discipline up to and including termination of employment.

Retaliation and adverse employment consequences may include, for example, intimidation,

bullying, harassment and discrimination, failure to promote, adverse impact on compensation or benefits, termination, suspension, demotion, or other change in responsibilities whether formal or informal. Staff and Volunteers who believe they have suffered retaliation or adverse employment consequences as a result of having reported a Whistleblowing Concern should inform the appropriate Policy Administrator and are encouraged to refer to IECE Harassment and Discrimination Policy.

9. False disclosure

IECE will treat all disclosures of malpractice seriously, and protect staff who raise concerns in good faith. However, appropriate action will be taken in accordance with disciplinary procedures against staff who are found to have made a disclosure that they know to be untrue.

This *Whistleblowing* Policy has been reviewed and approved by IECE Board on 30th November 2020.

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Board Chair person

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Community Empowerment
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