

## WHISTLE BLOWER, ANTI-RETALIATION POLICY & COMPLAINT MECHANISM

### Process Owner & Approving Authority

CEO & DCEO

#### 1.0 Overview

Policies and Control measures have been put in place to address exposures to fraud or corrupt practice, but where incidences of such are identified or perpetrated, Aflatoun encourages her workers to raise concerns with the appropriate internal authority. These concerns will be treated to the level of severity, integrity and confidentiality required.

#### 2.0 Objective

To ensure Aflatoun International creates an avenue for employees, consultants, volunteers, interns and partner organizations, to confidentially report suspected misconduct within Aflatoun, and among Aflatoun network (ie. Aflatoun and its Partner Organizations) and to ensure appropriate protection against retaliation.

This policy outlines the procedures for reporting, investigating, and responding to suspected misconduct, including protection for individuals or organizations which reported the misconduct.

#### 3.0 Eligibility & Coverage

This policy relates to misconduct within the Aflatoun Network. Misconduct means any illegality, breach of Aflatoun policies, abuse of authority, danger to health or safety, sexual exploitation and abuse and any other activity that undermines the mission of the organization. Examples include, but are not limited to, corruption, fraud, theft, misrepresentation, sexual harassment, abuse of children's rights, misuse of Aflatoun property and retaliation against whistle-blowers. The terms of this policy apply globally to all Aflatoun employees, consultants, interns, volunteers and partner organizations.

#### 4.0 Policy

##### 4.1 Duty to Report

Aflatoun employees, consultants, interns, volunteers and partner organizations have a duty to promptly report suspected misconduct associated with any activity of Aflatoun and to cooperate fully and truthfully in any internal or external review, audit, or investigation conducted by or on behalf of Aflatoun. Failure to report and/or cooperate, including by withholding material information, may result in disciplinary actions, including termination of employment or contractual relationship.

## 4.2 Who to report?

Reporting should be done by any employee, consultant, intern or volunteer by email as per the below:

Misconduct by	Report to
Any employee	Director/line manager of the department & our HR department  <a href="#">Employees can reach out also to the external confidant if needed</a>
Director/Manager of Department	Line manager &HR
Deputy CEO	CEO
CEO	Chair of the board
Partner organization employee	Programme manager/Head of Programmes & Deputy CEO/CEO

For employees who do not wish to report internally, may report to an external adviser on the following email or contact by phone: Martha Walstijn, 085-7739324, [m.walstijn@consensearbo.nl](mailto:m.walstijn@consensearbo.nl)

## 4.3 Complaint mechanism

- Any misconduct should be reported, no employee or partner is exempted of the procedure. Any report is taken very seriously, and an investigation is conducted.
- Reports must be made by email to the concerned focal point (Please refer to the above table)
- The following communication line can be used in case of corruption and bribery, sexual harassment, sexual exploitation and abuse, and/or violation of Aflatoun's policies: [complaints@Aflatoun.org](mailto:complaints@Aflatoun.org)
- Individuals submitting reports of suspected misconduct should submit all pertinent information with regard to the suspected misconduct including any documentary or other evidence. While reports of suspected misconduct may be submitted anonymously, including the name of the individual making the allegation may add to the credibility of the allegation and may facilitate a more effective investigation.
- Once the report is received, the complaint is recorded in the tracking sheet.

## 4.4 Investigation

- The decision whether a review, audit, or other investigation is warranted under the circumstances will be determined on a case-by-case basis by the Deputy CEO and CEO (or the Chair of the Board, as applicable). Such a decision should be made within 24

hours following the reception of the complaint in case of SEA or 10 days for other types of misconduct.

- When conducted internally, investigations are conducted by: deputy CEO
- To avoid any retaliation against the employee, the employee's identity shall be kept confidential.
- SEA allegations are investigated within 1-week, remaining allegations may take up to 1 month.
- Aflatoun may contact the individual who made the report to request additional information that may be required for any investigation.
- Please note that for privacy reasons, Aflatoun will not provide the whistle-blower/complainant with information relating to the steps taken by Aflatoun or any outcomes resulting from the disclosure and subsequent investigations.
- To ensure accountability of appropriate actioning of whistle-blower/complainant reports, a list of reports, follow-up investigations, findings and actions taken over the course of the previous year will be reported confidentially to the board as part of its first meeting each year.

#### **4.5 Action**

- During the investigation period of serious allegations (SEA, Fraud...), the "suspect" is requested to remain at home, away from the alleged victim.
- In case of urgent matters where the safety of the individual is at stake, a decision must be made within 48 hours following the investigation.
- The investigation may result in legal actions based on a decision made by the CEO and the Chair of the Board
- Aflatoun will support the victim in filing a legal complaint if needed

#### **4.6 Accessibility**

Aflatoun makes reporting mechanism easy-to-use and remove potential barriers for usage (e.g. difficult or foreign language, costs and time needed for using them), keeping in mind their target audiences, including people of different ages, genders, educational backgrounds and abilities.

#### **4.7 Confidentiality**

Aflatoun treats information provided in a confidential way with utmost care. The identity of the whistle-blower will be kept confidential, however, Aflatoun may disclose this information if required by law, but will inform the whistle-blower before doing so. The whistle-blower is informed that actions have been taken without necessarily be informed about the details. All people involved in the complaint or who are aware of it, must respect the privacy of all persons involved, they may not discuss the complaint with third parties.

#### **4.8 Safety**

Aflatoun will avoid creating or exacerbating risks for those reporting allegations or concerns, as well as other parties involved (e.g., survivor, alleged perpetrator). This involves ensuring that investigation, referral procedures and protection measures are set up. Aflatoun will also restrict access to incident reports and keep reports stored safely (e.g., using passwords or encryptions for computers and lock offices when unattended).

#### **4.9 Transparency**

Aflatoun shall obtain prior informed consent of the complainant. Network Organizations should share confidentiality procedures with all complainants, explaining clearly how information will be shared, with whom and for what purpose, including for investigations and assistance to survivors.

#### **4.10 Bad faith conduct**

Making allegations through the Whistle-blower and Anti-Retaliation Policy that the individual knows to be false, intentionally and materially incomplete, or with an intent to misinform will be considered as Misconduct under this policy.

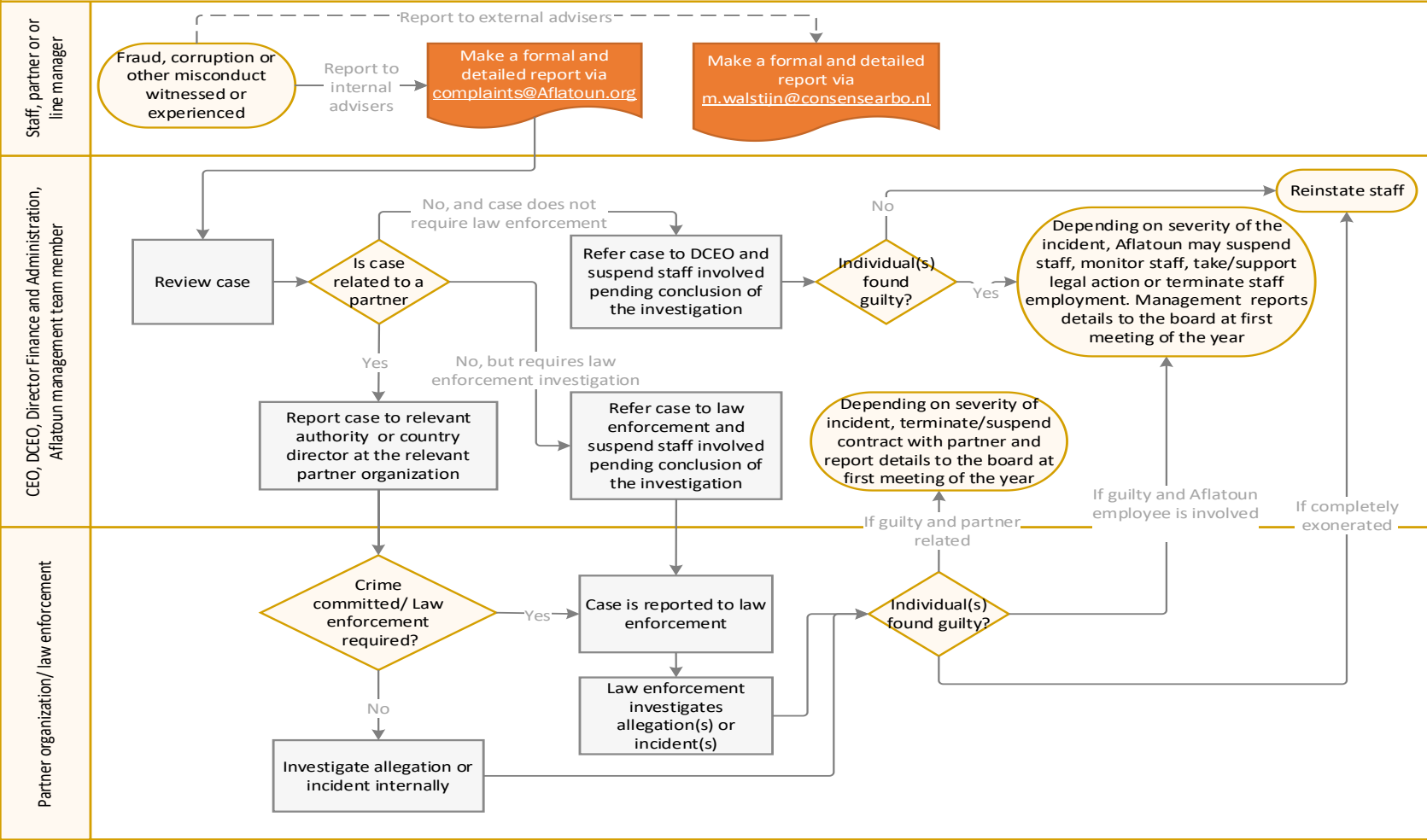
#### **4.11 Retaliation**

- Retaliation against whistle-blowers is strictly prohibited and is a misconduct.
- Aflatoun employees, consultants, interns, volunteers and partner organizations who retaliate against any person making a report shall be subject to disciplinary measures, up to and including termination of employment or contractual relationship.
- Examples of retaliation may include:
  - termination, and denial of renewal of contract or promotion unless otherwise justified;
  - other unjustified actions affecting employment such as negative evaluations, negative references, changes in duties, denial of leave or creation of an uncomfortable physical environment; and
  - bullying, harassment or intimidation.
- Reports of suspected retaliation will be treated as reports of suspected misconduct under this policy.
- Note that whistle-blowers and those participating in a review, audit or other investigation are not exempt from the application of normal standards of performance and conduct. Decisions in relation to performance evaluation, contract extension, etc will be made on the basis of performance and organizational needs, independently of any ongoing investigation.

#### **4.12 Communication**

- All current employees, consultants, interns and volunteers will be provided with a copy of this policy and made aware of their rights and responsibilities.
- Partner organizations will be informed of this policy through the development of new and expanded partnership agreements in 2022.

**Managing reported cases of misconduct**



Key Risk(s)	Current Control(s)
Case gets mishandled allowing the guilty to go free or the innocent to get punished	Staff and Aflatoun to handle alleged case(s) with utmost discretion till conclusive evidence is obtained

