

 <b>AFLATOUN</b> INTERNATIONAL	<b>Quality Management Process</b>		Ref: QP-xx	
			Ver: 01	
	<b>Whistle blower and anti-retaliation policy</b>		Issued by: MG Reviewed by: RM Approved by: RM	Date: 21-09-2017

# 1. WHISTLE BLOWER AND ANTI-RETALIATION POLICY

Revision No.	Revision Date	Changes	Author	Reviewed by	Approved by

## **Policy Owner**

Head of Finance & Administration

## **Purpose**

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

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

## **Scope and application**

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, and any other activity that undermines the mission of the organization. Examples include, but are not limited to, corruption, fraud, theft, misrepresentation, misuse of Aflatoun property and retaliation against whistle-blowers.

The terms of this policy apply globally to all Aflatoun employees, consultants, interns, volunteers, interns and partner organizations.

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## Policy

### 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 action, including termination of employment or contractual relationship.

### 2. Who to report to

- Aflatoun employees, consultants, interns and volunteers should raise a suspected misconduct in the first instance to the Head of their Department. Partner Organizations should raise suspected misconduct to the Head of Programmes.
- If the suspected misconduct involves the Head of Department, the reporting individual has reason to believe that he or she may be subject to retaliation, or the reporting individual has reason to believe that evidence of suspected conduct will be concealed or not acted upon, the individual may report the suspected misconduct to any other member of the Management Team (the CEO or any Head of Department).
- Once an Aflatoun employee has received a report of suspected misconduct, they must escalate the issue to the CEO for consideration.
- If the suspected misconduct involves the CEO, the reporting individual has reason to believe that he or she may be subject to retaliation, or the reporting individual has reason to believe that evidence of suspected conduct will be concealed or not acted upon, the individual or Head of Department may report the suspected misconduct directly to the Chair of the Aflatoun Board.

### 3. How make a report

- Reports may be made verbally, by email or in hard copy.

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- 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.

#### **4. What action will Aflatoun take?**

- 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 CEO (or the Chair of the Board, as applicable). Such a decision should be made within 30 days of the receipt of the report of suspected misconduct.
- 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 whistleblower 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 reports, a list of reports, follow-up investigations, findings and actions taken over the course of the previous year will be reported confidentially to board as part of its first meeting each year.

#### **5. Confidentiality**

- As much as possible, the Aflatoun will treat any information provided in a sensitive and confidential way. The identity of the whistleblower will be kept confidential, however, Aflatoun may disclose this information if required by law.

#### **6. Bad faith conduct**

- Making allegations through the Whistleblower 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.

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## 7. Retaliation

- Retaliation against whistleblowers is strictly prohibited and is 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 whistleblowers and those participating in a review, audit or other investigation are not exempt from the application of normal standards of performance and conduct and 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.

## 8. Communication

- All current employees, consultants, interns and volunteers will be provided a copy of this policy and made aware of their rights and responsibilities contained within it.
- Partner organizations will be informed of this policy through the development of new and expanded partnership agreements in 2018.

### Related Documents

*Aflatoun Finance Manual*

*Aflatoun Anti-money laundering, terrorism financing and sanctions policy*

*Aflatoun Anti-fraud and corruption policy (under development)*