

 AFLATOUN INTERNATIONAL	Quality Management Process	Ref: QP-xx	
		Ver: 01	
	Whistle blower and anti-retaliation policy	Issued by: MG Revised by: ECG Approved by: RM	Date: 22-03-2020

1. WHISTLE BLOWER AND ANTI-RETALIATION POLICY

Revision No.	Revision Date	Changes	Author	Reviewed by	Approved by
1	22-03-2020	Insertion of reporting mechanisms	ECG	MT	MT

Policy Owner

Director of Finance & Operations

Purpose

To ensure Aflatoun International creates an avenue for employees, consultants, volunteers, interns and partner organizations to confidentially report suspected misconduct within Aflatoun, 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, 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, interns and partner organization.

	Quality Management Process	Ref: QP-xx	
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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 Director of their Department. Partner Organizations should raise suspected misconduct to the Director of Programmes.
- If the suspected misconduct involves the Director of the 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 Director of Department).
- Once an Aflatoun employee has received a report of suspected misconduct, they must escalate the issue to the Director of Finance and Operations and 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 Director of the Department may report the suspected misconduct directly to the Chair of the Aflatoun Board.

3. Child Protection & Sexual Exploitation and Abuse

- Aflatoun's work involves working with children and partners that work with children therefore it is imperative this Whistle blower policy places emphasis on Aflatoun's Child Protection Policy and its policy on the Prevention of Sexual Exploitation and Abuse.

There should be PSEA messages for:

- A. Beneficiaries and community members covering 1) beneficiary rights (i.e. assistance is free; the right to information about the project/program; the right to be treated with respect, the right to report inappropriate behavior, etc.) 2) prohibited behavior of personnel; 3) how to report complaints (e.g. hotlines, contact of PSEA focal points).

	Quality Management Process	Ref: QP-xx	
		Ver: 01	
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B. Personnel covering 1) definition and prohibition of SEA, 2) relevant roles and responsibilities, 3) the organization’s reporting and referral procedures, including relevant contact details (e.g. PSEA focal points within Aflatoun)

- Ensure communication messages are adapted, materials and channels to the various target audiences, including children
- Widely publicize PSEA-related information

4. How make a report

- Reports may be made verbally, by email or in hard copy.
- 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.
- 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 Child Protection Policy please email complaints@afatoun.org

5. 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.

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		Ver: 01	
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6. Accessibility

- Aflatoun make reporting mechanisms 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, abilities

7. 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

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 investigating, 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).

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

10. 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.

11. 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

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- 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.

12. 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.

Updated version: 5 May, 2020