**ADVANCING COMMUNITY RESILIENCE INITIATIVE WHISTLEBLOWING POLICY.**

1. Purpose

At Advancing Community Resilience Initiative, it is vital that everyone who works for us maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. If an employee, volunteer, partner, consultant or contractor has any genuine concerns about malpractice in the workplace, we wish to encourage them to communicate these without fear of reprisals and in the knowledge that they will be **protected from victimisation and dismissal**.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

1. Scope and target of Whistleblowing policy.

In order to promote an internal culture involving correct behaviour, based on legality, and a good Corporate Governance system, Advancing Community Resilience Initiative presents this Whistleblowing Policy as the expression of the possibility offered to all those who collaborate with the organization and to the beneficiaries of the projects to report circumstances of supposed illegal, irregular or ethically incorrect behaviour occurring within the organisation.

The Policy is addressed in particular to all sectors of the Advancing Community Resilience Initiative in Uganda and abroad including the Board of Directors, the statutory and law Body, the employees, collaborators, volunteers, partners and beneficiaries of ACRI’S projects.

The organization guarantees that the proceedings to verify reports are carried out in respect of national and foreign legislation applying to the present policy.

Malpractice includes (but is not limited to) the issues listed below:

* Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
* A failure to comply with any legal obligations
* Sexual misconduct, including sexual abuse, harassment or exploitation
* Abuse or exploitation of children, vulnerable adults or beneficiaries
* Breach of ACRI policy
* Abuse of position
* Danger to the health and safety of individuals or damage to the environment
* Improper conduct or unethical behaviour
* Activity which would bring the organization into serious disrepute
* The deliberate concealment of information relating to any of the matters listed above.

1. Reporting crimes or irregular activity.

Each recipient of this policy is required to report any behaviours, risks and suspicions of offences or violations and other irregularities that might show up a malfunctioning of the Foundation, or even lead to damage to the organization that the whistle-blower becomes aware of in the place of work and/or during the execution of his or her duties and/or during relationships with the Organization.

Whistleblowing does not concern remonstrations or mere complaints of a nature personal to the whistle blower, nor claims and requests that fall under the discipline of work place relationships or relationships with superiors or colleagues, which are cases that must be referred to the competent personnel management units.

Specific procedure, published and periodically updated by the organization according to the evolution of the norms in force, is developed to define the communication channels for the reception of the reports, the methodology to be followed in their analysis, their processing and their final communication (including the action to be taken following the examination), as well as the steps to be taken in putting the procedure into practice.

Anonymous reports will be considered only if concerning facts of particular seriousness and of which the contents are sufficiently detailed and specific to bring to light facts and situations related to well define contexts.

As a general rule all communications must be addressed only to the Supervisory Body of the organization, which will deal directly with it in those cases where an act is reported which is in the interests or to the advantage of the organization and where the details of penal responsibility of the organization are identified.

1. Protection of whistleblowers

Advancing Community Resilience Initiative guarantees the protection of the identity and the person of the whistle blower in handling the report as provided for under the national law of the whistle blowers act 2010.

Furthermore Advancing Community Resilience Initiative, as provided for by national law, forbids any direct or indirect act of reprisal or discrimination against the whistleblowers for reasons directly or indirectly related to the report.

When ACRI employees or collaborators, namely persons with a direct or indirect subordinate work contract who, in good faith and in the interests of the organization's integrity, reports presumably illicit behaviour, significant and based on precise and coherent elements, of which they have become aware while carrying out their business relationship, they may not be sanctioned, demoted, fired, transferred or subjected to other organisational measures of redress, with direct or indirect negative effects on the work conditions, as a result of the report.

Furthermore “Firing of the whistleblower as reprisal or discrimination is null”. The changing of roles are also null, as are any other discriminatory measures or reprisals against the whistle blower

In cases of controversy linked to the application of disciplinary sanctions or of role change, firing, transferral, or of imposition on the whistleblower of other organisational measures with direct or indirect negative effects on the conditions of work following the reporting, the employer must demonstrate that such measures are based on reasons unrelated to the whistleblowing.

The whistleblower procedure describes the details on the protection of whistleblower identity and the management of cases related to the retaliation against those who have undertaken the report.

1. Whistleblowers' responsibilities

The whistleblower is responsible for any form of abuse of the present policy, such as reports that are clearly opportunistic and/or made with the sole purpose of harming the person charged or other persons, and for any other suspicion of improper use or of intentional manipulation of the institution this policy refers to.

Should, at the end of the preliminary inquiry, the report be shown to have been self-serving or intentionally false the disciplinary steps indicated in the Human Resources Policy will be taken against the person who presented the report, and a crime complaint will be made to appropriate authority, in case of crime.

1. Please note this procedure is not intended to replace ACRI’s Grievance Procedures, which continues to be the appropriate way to raise personal issues relating to the specific job or employment.
   1. Raise the matter with your line manager, who will consult with the appropriate contact point. If you feel that you are unable to raise the matter with your line manager, and you are able to, raise it with a more senior manager.

At the point of raising a concern it would be useful for you to share information describing:

* Whether anyone is at immediate risk of harm?
* What happened? If possible make note of dates, times, places, people.
* Who is involved?
* How do you know about it?
* When were you first concerned about it?
* Have you told anybody about it?
* Was any action taken?

All managers should:

* Report incidents of theft, fraud, or corruption immediately to [NGO]’s Fraud and Corruption lead
* Report Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any [NGO] representative to [NGO]’s Safeguarding lead
* Report any other incidents of malpractice in the workplace to your HR team, or to the Head of Human Resources
  1. A decision will be made on whether it is appropriate to handle such complaints under this policy. Where not appropriate the complainant will be informed and their permission sought to divert the issue to the appropriate HR procedure.
  2. When matters are reported to the Fraud and Corruption lead, [NGO]’s Fraud and Corruption policy will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.
  3. When matters are reported to the Safeguarding lead, [NGO]’s Safeguarding Investigation Guidelines will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal.

You will be notified once the matter has been resolved, but outcomes are subject to confidentiality and may not be communicated.

Advancing Community Resilience Initiative will take appropriate action, which may end in dismissal, in accordance with the relevant procedure against any employee, volunteer or consultant who:

* Has been found to be victimizing another individual for using this procedure, or deterring them from reporting genuine concerns under it.
* Made a disclosure maliciously that is known to be untrue or without reasonable grounds for believing that the information supplied was accurate.