

Whistle Blowing Policy



Resource Development Foundation (RDF)

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1. Introduction and Background of the organization

Resource Development Foundation (RDF) has started its voluntary activities in response to support the victims of the catastrophic cyclone in 1970 by responding to catastrophic cyclone initiated by the founder of Resource Development Foundation. Since then the group of volunteers under the leadership of the Founder of RDF, who was a little boy, continued with the post disaster early recovery activities for the neighbouring victims in order to restore their lives and livelihood into normalcy.

Since then, the philanthropic group continued their voluntary social works and got formal organizational identity in 1993 being registered with department of Social Service (DSS), under the ministry of Social Welfare of the Government of Bangladesh, as a voluntary social development organization named Resource Development Foundation, popularly known with its acronym "RDF".

Since its inception as a devoted social development organization, with clear Vision, Mission and Objectives, RDF has served local (initially in Borguna, a district located in southern part of Bangladesh). Eventually, RDF was registered under other concern government authorities and departments, like NGO Affairs Bureau, Department of Women Affairs under Ministry of Children and Women Affairs of government of Bangladesh, Micro-credit Regulatory Authority (MRA) etc.

2. Vision of the organization

A poverty free society where everyone has access to resource for sustainable livelihoods, health, education and lives with dignity in a clean and sustainable environment.

3. Mission of the Organization

RDF facilitates improvement of life and livelihood of the poor, excluded and climate vulnerable people by promoting socio-economic empowerment, establishing social cohesion for peace and improving access to resources and opportunities for sustainable development. RDF collaborates with community people, government including local government, NGOs, networks/forums and donors to ensure sustainable development.

4. Values

RDF is committed to its values of Accountability, Integrity, Inclusiveness and Transparency.

5. Strategic Objectives of the Organization

RDF has recently revisited and revised its strategic pathways as its Core Businesses (Focus) based on its expertise as well as national and international priorities and commitments into four (4) major thematic areas, like (a) **Social Development**, (contributing to the SDG-1,2,3,4,5,6 & 11), (b) **Economic Empowerment** (contributing to the SDG-1,2,3,5 & 8), (c) **Resilience to Climate Change** (contributing to the SDG-1,2,3,7 & 11), (d) **Capacity Building/HRD and ,Research** (contributing to the SDG-1,2,3,4,5,6 & 11). The strategic priorities of RDF contributes to the mentioned SDGs through implementation of all its activities.

6. Purpose of the Policy

This Whistle Blowing Policy is intended to encourage employees and others to make good faith reports of suspected fraud, corruption, any form of child abuse or other improper activity, or

health and safety concerns within the organization to appropriate authority and to describe the process that will be followed by the organization in evaluating and investigating such reports.

The focus of the policy is on the reporting of "Improper Activity" the investigation of which is coordinated by the Administrative Policies & Compliance.. Other matters that get reported to the authority or the Focal Point, for example, suspected organizational policy violations or various workplace concerns, are generally referred to the management of the responsible department.

This procedure applies to all RDF employees, including Associates and contractors. This procedure does not replace other RDF policies or procedures. For example, if an employee has a grievance about their working conditions they should use the RDF-Bangladesh Grievance Policy or, if they felt that their manager or a colleague was treating them unfavorably, they should use the RDF- Sexual Harassment Policy. Similarly if an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise these with their Focal Point or the line manager, or if that is not possible, with the CEO.

This procedure applies to, but is not limited to, allegations about any of the following:

- ☐ Conduct which is an offence or breach of organizational policy, practices and culture.
- ☐ Serious Health and Safety risks
- ☐ The unauthorized use or misuse of organization funds
- ☐ Unauthorized use of organizational assets
- ☐ Unauthorized engaging organizational employee for personal works.
- ☐ Child Labour
- ☐ Possible fraud and corruption
- ☐ Sexual, physical or verbal abuse, or bullying or intimidation of employees, beneficiaries or service users
- ☐ Abuse of authority
- ☐ Other unethical conduct

7. Reporting

RDF is aware of that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty either to RDF and/or to those for whom the RDF or they are providing a service. RDF will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the organizational interest to do so from any reprisals, harassment or victimization.

Contact Details for Reporting: Focal Point for Whistle Blowing i.e. the Director HRM & Admin Department, RDF head office in Dhaka. The Contact detail for such reporting should be published in public i.e. in all its offices, sub-offices and branches.

8. Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless the whistleblower otherwise requests. However, if the matter is subsequently dealt with through other RDF-Bangladesh procedures such as the Disciplinary Procedure. Similarly, if the allegation results in court proceedings then

the whistleblower may have to give evidence in open court if the case is to be successful. RDF will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

9. Anonymous Allegations

This procedure encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the CEO of RDF. In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- ☐ The seriousness of the issue raised
- ☐ The credibility of the allegation; and
- ☐ Whether the allegation can realistically be investigated from factors or sources other than the complainant

10. Untrue Allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

11. Procedure for Making Allegation

It is preferable for allegations to be made to an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:

- ☐ The Focal Point (Director HRM & Admin)
- ☐ Chief Executive Officer

If either of the above receive an allegation he/she will consider the allegation and may discuss with either the Focal Point or the CEO. The line manager (or either/or both) of the above, after consideration, will discuss with the whistleblower and if they wish to proceed with the allegation will be investigated.

12. Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- ☐ The name of the person making the allegation and a contact point.
- ☐ The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- ☐ The specific reason for the allegation. Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide

information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Someone making an allegation may be accompanied by another person of their choosing during any meetings or interviews in connection with the allegation. However, if the matter is subsequently dealt with through another procedure the right to be accompanied will at that stage be in accordance with the relevant procedure.

13. Action on receipt of an Allegation

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- ☐ The record of the allegation;
- ☐ The acknowledgement of the allegation;
- ☐ Any documents supplied by the whistleblower

The investigator will ask the whistleblower for his/her preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality. If the allegation relates to fraud, potential fraud or other financial irregularity the Treasurer will be informed within 5 working days of receipt of the allegation. The Treasurer will determine whether the allegation should be investigated and the method of investigation. If the allegation discloses evidence of a criminal offence it will immediately be reported to the Board of Trustees and a decision will be made as to whether to inform the Police. If the allegation concerns suspected harm to children the appropriate authorities will be informed immediately.

If the issue is around suspected harm to vulnerable adults, the Vulnerable Adults policy, the Mental Capacity Act Policy and the Deprivation of Liberty and Safeguarding Policies should be referred to.

14. Time table

- ☐ An acknowledge the allegation in writing within 10 working days with
 - An indication of how RDF-Bangladesh propose to deal with the matter o
 - An estimate of how long it will take to provide a final response
 - An indication of whether any initial enquiries have been made o
 - Information on whistleblower support mechanisms
 - Indication whether further investigations will take place and if not, why not.

Where the allegation has been made internally and anonymously, obviously the RDF-Bangladesh will be unable to communicate what action has been taken.

15. Support

The RDF will take steps to minimize any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings RDF will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available. RDF accepts that whistleblowers need to be assured that the matter has been

properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

16. Responsibility for the Procedure

The ED and Executive Committee have overall responsibility for the operation of this Procedure and for determining the administrative processes to be followed and the format of the records to be kept.

17. Monitoring

A Register will record the following details:

- ☐ The name and status (e.g. employee) of the whistleblower
- ☐ The date on which the allegation was received
- ☐ The nature of the allegation
- ☐ Details of the person who received the allegation
- ☐ Whether the allegation is to be investigated and, if yes, by whom
- ☐ The outcome of the investigation
- ☐ Any other relevant details

The Register will be confidential and only available for inspection by the Executive Committee. The ED will report annually to the Executive Committee on the operation of the Procedure and on the whistleblowing allegations made during the period covered by the report. The report will be in a form which does not identify whistleblowers.

18. Conclusion

Whistleblowing Policy of RDF is not a static document, it is expected to review and update from time to time to be a living and evolving document. Therefore, with the change of requirements, it is imperative that this policy is also updated/ modified with approval of the CEO. HRM & Admin section shall notify changes to the manual. All pages are dated to ensure accuracy. The manual will have loose-leaf binding as the interim amendment (page) can be included easily. In each three year, RDF management will form a review committee or recruit an external consultant to review the whole documents and the committee/consultant will submit the proposed amendments to the authority of RDF. The employees of RDF can recommend any amendment/inclusion/exclusion to the committee /consultant. one female staff will be included in the committee. All types of amendment/ inclusion/exclusion will be done subject to prior approval of CEO.