

CGIAR Integrated Partnership Policy on Whistleblowing and Protection from Retaliation

1. Policy Overview

The CGIAR Integrated Partnership is committed to the highest standards of accountability, transparency, and ethical conduct. In accordance with its CGIAR Core Ethical Values, which are Integrity, Dignity and Respect, Sustainability, Excellence in Innovation, and Partnership, the CGIAR Integrated Partnership is also committed to fostering a diverse, inclusive, fair and safe working environment and a work culture where individuals are encouraged to speak up against wrongdoing.

This policy establishes a consistent framework for whistleblowing across all member organizations of the CGIAR Integrated Partnership, ensuring that concerns about misconduct, unethical or unlawful conduct are reported and addressed responsibly and effectively, emphasizing the protection of due process, confidentiality, and transparency.

Each member organization within the CGIAR Integrated Partnership retains autonomy in managing case-specific procedures under the oversight of its governing body, while adhering to this policy's principles. The definitions and terms in this document do not alter, change, or modify the terms and conditions or privileges and immunities of the individual Centers.

2. Objectives

The objectives of this policy are to:

1. Foster a culture of accountability and ethical behavior.
2. Encourage reporting of unethical, unlawful, or improper conduct.
3. Ensure protection for individuals who report misconduct.

3. Scope

This policy applies to:

- All Personnel¹ of the Centers and System Organization that comprise the CGIAR Integrated Partnership, including full-time and temporary staff, consultants, trainees, interns, and students.

¹ The broad use of the term 'personnel' under this policy shall not be construed to create an employer-employee relationship between any category of person indicated above with the CGIAR System Organization or any CGIAR Center.

- Third parties such as contractors, vendors, and partners engaged by CGIAR Integrated Partnership member organizations.
- Subsequently, all covered parties are generally referred to as ‘Personnel’.

This policy governs:

- All CGIAR Integrated Partnership operations, including fieldwork, research, and interactions with vulnerable populations.
- Conduct of Personnel during and outside of work hours, for both professional and private activities that may impact the CGIAR Integrated Partnerships reputation, interests, or mission, regardless of where the activities occurred.

When required by external partners, such as governments and independent agencies, CGIAR member organizations will include adherence to this policy in collaboration agreements. These policies are written to complement and coexist with policies of sponsors and funding agencies and will be interpreted consistently where possible, with guidance sought internally from the ethics advisor, legal office, or other designated representative within their organization.

4. Policy Statements

1. **Duty to Report:** All Personnel within the CGIAR Integrated Partnership have a duty and are encouraged to report suspicions of misconduct, unethical behavior, actual or possible violations of laws or policies, or CGIAR Integrated Partnership rules as soon as possible after the relevant event.
2. **Good Faith Reporting:** Reports should be made in good faith in accordance with relevant procedures for reporting misconduct and contain sufficient detail to allow for proper assessment. Anyone who files a complaint that is known to be false or malicious, or with a reckless disregard for the truth of the statements made, may be subject to administrative or disciplinary action.
3. **Protection Against Retaliation:** The CGIAR Integrated Partnership strictly prohibits any form of retaliation against whistleblowers and ensures measures to protect individuals engaging in protected activities.
4. **Autonomy in Case Management:** Each member organization within the CGIAR Integrated Partnership will handle reported cases in alignment with its own established procedures while upholding the principles of this policy.
5. **Consistency and Transparency:** Handling of cases will be consistent across the CGIAR Integrated Partnership, with transparency in processes and outcomes to the best of their abilities while maintaining confidentiality.
6. **Confidentiality:** All reports will be treated with the highest level of confidentiality, with information shared on a need-to-know basis, ensuring the protection of due process, adherence to applicable law, and the rights of individuals involved subject to the immunities and privileges of the Center of System Organization.

7. **Impartiality and Fairness:** Investigations will be conducted objectively and in line with due process to ensure fairness to all parties.
8. **Independent Third-Party Investigation:** Reports of misconduct may be referred to qualified independent law firms for investigation in cases where Chief Executive Officers / Director Generals or Board or Board Committee members are conflicted, or where the required capacity to investigate is not available, with consideration of the seriousness or complexity of the alleged misconduct.

5. Reporting Mechanisms

Reports should be factual and submitted promptly after the incident and contain as much information as possible to allow for proper assessment of the nature, extent, and urgency of the matter to allow for timely resolution. Individuals can report concerns through the following mechanisms:

1. Internal Reporting Channels:

- **Direct Supervisors or Senior Managers:** Supervisors must escalate reports to the appropriate Ethics, Legal, or Human Resources teams.
 - **Human Resources/People and Culture:** Reports can be directed to the respective member organization's HR department.
 - **Legal Office / Counsel:** Reports can be submitted via email or in person.
 - **Ethics and Business Conduct Representative / Focal Point:** Reports can be submitted via email or in person.
2. **Whistleblowing Hotline:** An independent channel (e.g., Lighthouse Services) is available for each CGIAR Integrated Partnership Member Organization for anonymous and identifiable complaints, ensuring confidentiality and protection. The hotline also has the ability for a complainant to ask for updates and to exchange messages with the Ethics and Business Conduct focal point handling compliance cases within each organization, all while maintaining anonymity.
 3. **Third-Party Reporting:** Personnel are expected to report suspicions of misconduct through the above-established channels. Protection from retaliation will be extended to individuals who report their concerns externally if:
 - a. The individual reported their suspicions to their employing CGIAR Integrated Partnership member organization using the established internal channels, and the member organization failed to inform the individual of the status of the matter within six months of the report.
 - b. External reporting is necessary to avoid imminent danger to public interest, substantial damage to CGIAR Integrated Partnership operations, or violations of law.

6. Protection Against Retaliation

1. **Reports of Retaliation:** Personnel who have reasonable grounds to believe that retaliation has been taken against them, or will be taken against them, for having engaged in a protected activity may seek redress by submitting a retaliation complaint through the internal reporting channels listed above as soon as possible, and no later than 6 months following the adverse action. Retaliation complaints will be responded to in a timely manner based on seriousness, severity and urgency of the complaint.
2. **Immediate Protections:** based on a preliminary assessment of the complaint, the employing CGIAR Integrated Partnership member organization may implement interim measures to protect whistleblowers, such as reassignment, offering remote working arrangements, a request to take leave, and/or suspension of reported retaliatory actions. Interim measures may be requested by the complainant in their written submission and must be agreed to by the employing CGIAR Integrated Partnership member organization before they are implemented.
3. **Scope of Protection:**
 - Applies to individuals reporting misconduct, participating in investigations, or assisting whistleblowers.
 - Extends to external reporters when internal mechanisms are proven ineffective or pose risks to public safety or organizational integrity.
4. **Accountability for Retaliation:** Individuals found to have engaged in retaliatory actions will face disciplinary measures, up to and including termination of employment or contracts. Attempts by management or staff to identify an anonymous whistleblower's identity will be taken seriously and may result in disciplinary action.
5. **Resolution:** Complaints are resolved following the procedures established by the respective member organization within the CGIAR Integrated Partnership, ensuring adherence to due process and confidentiality.

7. Responsibilities

Personnel are expected to:

- Report concerns or suspicions of misconduct promptly and in good faith.
- Cooperate fully with investigations while maintaining confidentiality.
- Participate in ethics training and awareness campaigns.

Leadership is expected to:

- Promote a culture of ethical behavior and lead by example.
- Ensure all Personnel are aware of and trained on this policy.
- Act decisively on breaches of this policy and ensure protection for whistleblowers.

Governance and Oversight must:

- Monitor compliance with this policy across all CGIAR Integrated Partnership member organizations.
- Ensure the provision of training and resources to ensure consistent application of this policy.
- Address systemic issues that arise from reported cases.

8. Implementation and Training

The CGIAR Integrated Partnership will:

- Ensure all Personnel receive training on this policy during onboarding and at regular intervals.
- Provide resources and tools to facilitate reporting and case management.
- Monitor and evaluate the policy's effectiveness across the CGIAR Integrated Partnership.

9. Revision and Review

1. **Policy Review:** This policy will be reviewed every three years or as required to adapt to evolving global standards and operational contexts.
1. **Responsible Officials:** Ethics and/or Compliance Leads of CGIAR Integrated Partnership Member Organizations

Annex: Definitions

1. **Whistleblower:** An individual who reports in good faith a reasonably held suspicion of misconduct or violation of policies, procedures, or applicable laws within the CGIAR Integrated Partnership.
2. **Retaliation:** Any unjustified adverse action recommended, threatened, or taken against an individual for engaging in protected activities, including reporting misconduct or cooperating with investigations. Examples include, but as not limited to:
 - Termination of employment
 - Unjustified demotion or reduction in base salary
 - Denial of opportunities for promotion
 - Unwarranted poor performance appraisals
 - Changes in job duties or other negative decisions affecting the individual's terms and conditions of employment
 - Withholding of resources for work assignments
 - Deliberately causing professional harm within the scientific community
 - Unjustified denial of authorship on publications or research papers.
3. **Protected Activity:** Activities such as reporting misconduct, assisting whistleblowers, or cooperating in investigations or grievance processes, carried out in good faith and with reasonable grounds.