



# WHISTLEBLOWING POLICY OF AFAD



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[www.afadbd.org](http://www.afadbd.org)

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## **1. Introduction**

The Whistleblowing Policy of Association For Alternative Development (AFAD) reinforces the organization's commitment to its policies, values, attitudes, and behaviors by providing an alternative channel for promptly reporting serious problems. This policy aims to establish an effective procedure for addressing concerns related to abuse, serious malpractice, or professional misconduct while upholding high standards of honesty, integrity, and accountability as outlined in its values and Code of Conduct. AFAD promotes a culture of respect, ethical behavior, corporate compliance, and good governance.

AFAD encourages individuals to report any suspicions of illegal, unethical, corrupt, fraudulent, or undesirable conduct by any party associated with the organization, including employees, volunteers, interns, or those involved in business dealings with AFAD. To ensure accessibility, AFAD offers various paths for reporting misconduct to accommodate individuals from diverse backgrounds, whether they are employees, partners, program participants, or members of the wider community. Concerned individuals can report issues online, via phone, in person, or through community feedback channels, with each report handled confidentially and with utmost seriousness.

## **2. Purpose & Scope**

The purpose of the policies are:

- Encourage Whistle-blowers to feel confident about raising concerns about relevant wrongdoings.
- Provide avenues for Whistle-blowers to report relevant wrongdoings and receive feedback on any action taken.
- Reassure Whistle-blowers that they will be protected from reprisals for making a disclosure in accordance with this policy.
- Display the organization's commitment to honest practices, and responsible conduct of its employees, partners, and stakeholders, and to recourse should these not be adhered to.

This policy applies to all individuals associated with AFAD and its partner organizations who are in a relationship with AFAD. It covers the responsibility to report wrongful acts committed by staff of AFAD, partners, and members of the governing body. Serious misconduct/ malpractices include wrong-doing, corruption, bribery or theft, criminal offenses, non-disclosure of a conflict of interest, or the abuse of power-including sexual exploitation abuse & harassment. This may include, but is not limited to:

- i. Financial and procedural malpractice including those relating to mismanagement; misappropriation of funds; actual or suspected fraud or abuse of authority.
- ii. Falsification of organizational records for personal gain or gain for others on the part of Staff, partners, and members of the Governing Body.
- iii. Miscarriage of justice
- iv. Attempting to cover up any of the above
- v. Breach of the Organization's policies and procedures.

This procedure does not replace other policies and procedures such as the AFAD Code of Conduct, Complaint & Response Policy, Gender policy, Anti-Fraud and Corruption Policy, PSEAH and Safeguarding policies and other policies with specifically laid down statutory reporting procedures but will complement such procedures.



**Chairman**  
Association For Alternative  
Development (AFAD)  
Kurigram

### **3. Procedure for Raising a Concern/ Reporting**

**AFAD Staff** may raise concerns with their Line Manager, in the first instance verbally, but subsequently supported in writing, and where possible, with supporting evidence. If staff do not feel comfortable speaking to his/her line manager for any legitimate reason or because of fearing negative personal consequences such as reprisal, victimization or dismissal, staff may contact the line manager's superior.

**Partners, beneficiaries, and all other stakeholders**, who are concerned that there has been an instance of malpractice, should initially raise it with the Program Coordinator/Chief Executive. This can be done initially verbally, but subsequently supported in writing, and where possible, with supporting evidence. Similarly, if the Partner feels that their Program Coordinator is a part of such malpractice, they can raise the issue with the Chief Executive. If there is any complaint against the Chief Executive, they can report to Board of Directors/ EC members.

In exceptional circumstances where it would be inappropriate to approach either the AFAD manager or their supervisors, it is recommended to send the concern to the AFAD via email to Chief Executive or Chair of Board of Directors/ EC members.

AFAD encourages Whistle-blowers to provide as much detail about their concern/s as possible, however at the same time, it is noted that it is not the Whistle-blower's role to investigate. Provision of the following information is recommended where possible:

- Provide a description of the alleged wrongdoing. Where possible provide any existing information that supports the allegation (e.g. emails, photographs)
- Date the disclosure.
- Provide contact details for follow-up by AFAD on the concern raised.

### **4. Confidentiality**

Staff, partners, volunteers who raise concerns of malpractice or misconduct will be accorded protection from victimization, or any other hostile behavior. However, any person coming forward with such a concern/allegation will follow due procedure and give ample reason to show that these concerns have been raised in good faith. The identity of the person who raises concerns will be kept confidential as far as possible. However, this protection will be accorded to those individuals who make such disclosure with honest intention, and without malicious intent or spite.

AFAD encourages both anonymous and open disclosures, however we note that investigations may be more difficult if there is a need to obtain further information in the case of an anonymous report.

The confidentiality of their reports will be kept to the extent possible, consistent with the need to conduct an adequate investigation. However, in certain cases, this may not be possible, particularly in instances warranting police investigation or when a disciplinary hearing is held, where individuals will need to make a statement.

AFAD will work with Whistle-blowers to ensure that they receive information about their status under national law (for example, if their identity will need to be disclosed). Thus, the security of the Whistle-blower will be paramount.

If it is deemed necessary that the investigating party involved be informed of a Whistle-blower's identity, it will be discussed with the Whistle-blower in advance. AFAD hopes that individuals will feel able to voice Whistle-blowing concerns openly under this policy. However, if the individual wishes to raise concerns

anonymously, AFAD will make every effort to keep their identity secret.

## 5. Handing the Report Cases

- ❖ The Line Manager/Coordinator/ Chief Executive, who receives such a report, will acknowledge receipt of the report within five working days.
- ❖ A Committee set up who are responsible for properly investigate all reports and this will have at least five members, including the Chairperson of the Committee, a woman employee, a male employee, a representative from HR and a representative of the Staff Association. Reported cases may also be passed to an external team for investigation where considered appropriate.
- ❖ All concerns raised will be investigated carefully and thoroughly. Any person accused of alleged misconduct will have the right to present their account of events in all fairness at the earliest opportunity.
- ❖ Upon investigation, Management should take the appropriate corrective action warranted by the outcome of the investigation.
- ❖ The Whistle blower would also be notified of the outcome of an investigation whenever it is possible to do so.
- ❖ There may be occasions when external bodies such as donors and regulators will be notified of the outcome of an investigation.
- ❖ On an annual basis, issues raised through whistle blowing will be tracked and reported to the Board/ Executive Committee.

## 6. False Allegations

Any allegations not made in "good faith" or found to be false or malicious, will be treated as a disciplinary offence and will be investigated in accordance with extant procedures.

## 7. Prevention of Reporting

If some person tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, AFAD will take this to be a serious disciplinary misdemeanor or and this instance will be investigated in accordance with extant policies.

## 8. Notification

- All departmental heads and in particular human resource managers are required to notify and communicate the existence and contents of this policy to the employees of their department and to all new employees respectively.
- The Chief Execute is responsible for creating a working culture that enables staff and others to raise concerns.
- The policy will be reviewed and, if necessary, revised every two years, or earlier if needed.