



## Management Policy for individual misconducts – General Directorate of WAF – 2017

### PROCEDURE FOR RECOURSE OUTSIDE THE OFFICIAL CHANNEL: WHISTLEBLOWING

« Creating a climate of intolerance towards misconduct. » For all WAF personnel: national, international, permanent & daily worker staff.

#### A. Introduction

Like all human organizations, WAF must deal with the fact that some of the people belonging to the organisation might abuse their power or the symbolic, material and human capital entrusted to them in order to gain personal advantages or to harm others, either inside or outside WAF. This emphasises the reaffirmed and reinforced policy WAF has had over the past few years, supported by the board of directors and by the management team, which aims to improve the identification, notification and management of individual misconduct.

#### B. Complaint or reporting mechanisms

Since there is no exhaustive list of all possible abuses, and victims are often too vulnerable to complain directly, detection of abuse is everyone's responsibility. WAF seeks to guarantee that its personnel working at headquarters and in the field missions respect the above-mentioned ethical reference points. To ensure this, WAF applies policy and procedural rules, including the labour law of the countries of interventions. In line with these provisions, WAF guarantees the management, supervision and evaluation of its various personnel, and gathers, through an official (hierarchical) reporting system, information and complaints concerning its personnel. In addition, WAF has also set up a second (also known as 'whistle blowing') reporting system which is outside of the official (hierarchical) channel in order to give to its personnel the possibility of notifying particularly serious situations or behaviours. (*These behaviours may concern the personnel and/or beneficiaries in WAF missions*). This 'whistle blowing' mechanism was set up in accordance with the Ugandan national commission for information and liberty, so that individual rights and liberties are safeguarded.

#### C. Reporting by an WAF employee

Anyone employed by WAF must report to WAF (according to the procedure described in his employment contract and the internal regulations) any abusive behaviour or other discriminatory or prejudicial treatment of which he has knowledge, without necessarily having been the victim. If he doubts the efficiency of the direct official (hierarchical) alert mechanism, any employee may use the confidential 'whistle blowing' mechanism. *In all events, it will be necessary to evaluate: The seriousness of the accusation; the willingness or refusal of the victim to be identified and confronted; the safety of the various people involved; the possibility or impossibility of conducting an investigation presenting opposing arguments, the appropriateness of temporarily removing the concerned or affected persons; the appropriateness of disciplinary measures ranging from a warning to dismissal, and/or notifying the legal authorities. This evaluation may be done in the field or at headquarters, by those in charge or by an ad hoc team made up, depending on the case, of one or several people, male or female, members of the Management team or appointed by it, members of the Board of Directors. These decisions must be justified. Persons lodging a complaint or report will be notified by their immediate supervisor, or by the Operations department, of the steps taken and of the final decision. If need be, they may bypass the official channels with their complaint or report.*

#### D. Ensuring recourse outside the official channels (Whistle blowing)

It is agreed that people will always have the choice of going outside the official channels to submit their complaints or reports, if they believe that the official channels are ineffective or inappropriate, or for any other personal reason. Complaints and reports may be entrusted to any WAF member or employee. However, this mechanism should not substitute other existing reporting channels. i.e. this mechanism should not become an "organised denouncement system" at the work place.

Contrary to the direct complaints, the 'whistle blowing' mechanism outside the official channels will be limited to specific areas: financial issues, moral and physical integrity of employees or other vital WAF interests including issues linked to medical practices. Such persons must immediately notify, by their choice, either the General Management team or the Board of Directors, via its president or one of its members.

A specific email address has been created for these alerts: [waf.uagnda@worldactionfund.org](mailto:waf.uagnda@worldactionfund.org). A representative of the general management of WAF is in charge of the follow up of these issues and manages this mailbox. This person abides by professional rules of reinforced confidentiality.

The complaint or report will be examined through an ad hoc mechanism, according to the evaluation criteria described above (§C.1) and the general conditions described hereafter.

#### General conditions for the examination

'Whistle blowing' alerts outside the official channel are dealt with in a confidential manner but not anonymously. The person lodging the alert should therefore identify himself. WAF guarantees to keep confidential the identity of the person reporting the alert if he requests so, and not to communicate his identity to the person concerned by the alert. WAF may, in exceptional circumstances, examine anonymous alerts provided that they are justified.

The person cited in the alert will be informed. There may be a delay in the information (s)he receives in order to allow the case to be prepared, including taking measures to prevent the destruction of proof required for examining the alert, or to avoid pressure on witnesses or the person raising the alert.

Information collected during the examination of alerts or complaints should be formulated in an objective manner, be directly linked with the concerned facts and qualified. The information should be noted on a specific form.

The person in charge of the alert mechanism will implement all necessary precautions to preserve the security of the data gathered while examining the alert, both during the collection, communication and safeguarding process. Access to these data will be protected



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through safeguarded systems. The author of unjustified, malicious or slanderous complaints or alerts may be sanctioned. Those lodging the complaint or report will be notified of the steps taken and of the final decision.