

Whistleblowing Policy

(Effective from July 01, 2018)



RISDA-Bangladesh

House #18, Road #1, Block #B, Section # 6, Mirpur, Dhaka- 1216
Phone: +88-02-9008133-34, Fax: +88-02-8034545
E-mail: risda.bangladesh@yahoo.com, Website: www.risda.org.bd

Table of Contents

1. Organization Background	2
2. Vision of the organization	2
3. Mission of the Organization	2
4. Values	2
5. Strategic Objectives of the Organization	2
6. Key Points	2
7. Scope	3
8. Reporting	3
9. Confidentiality	3
10. Anonymous Allegations	4
11. Untrue Allegations	4
12. Procedure for Making Allegation	4
13. Allegation	4
14. Action on receipt of an Allegation	5
15. Timetable	5
16. Support	5
17. Responsibility for the Procedure	6
18. Monitoring	6
19. Conclusion	6

1. Organization Background

RISDA-Bangladesh (Resource Integration and Social Development Association in Bangladesh) is a non-government voluntary development organization. The Organization came into existence in 1993. Since then as an outcome of the dedication, sincerity and tireless efforts of all irrespective of staff, volunteers, community people and development partners involved with RISDA-Bangladesh, the organization has grown into one of the reputed non-government development organization in Bangladesh and engaged significantly in transforming the lives of underprivileged, marginalized and hard to reach people in the country.

2. Vision of the organization

RISDA-Bangladesh envisions a society where deprived and discriminated people are living with sustainable development in their life and livelihood and with respect and dignity.

3. Mission of the Organization

Mission of RISDA-Bangladesh is to work with deprived and discriminated people, stakeholders in the society and state party for collective action to establish rights and entitlement for their life and livelihood.

4. Values

RISDA-Bangladesh is committed to values of mutual respect, equity, justice, rule of law, transparency, accountability, integrity and impartiality.

5. Strategic Objectives of the Organization

- ❑ To increase organizational capacity to become capable for quality management and institutional governance of RISDA Bangladesh for integrated development program.
- ❑ To strengthen and expand renewable energy base quality services and social business model for environment friendly economic sustainability of community and the institution.
- ❑ To increase income of the poor people with development of groups, awareness raising, accumulating savings and credit supports.
- ❑ .To empower poor people economically for sustainable livelihood of individual or group of poor people to live in the family and society in improved living condition.
- ❑ To empower poor and discriminated people for establishing their rights to access to public resources and services for their improved life with dignity and respect in the society.

6. Key Points

The Whistleblowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct. RISDA-Bangladesh is committed to the highest standards of transparency, probity, integrity and accountability. This procedure is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or

possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimized, discriminated against or disadvantaged. This procedure does not replace other policies and procedures such as the complaints procedure, the Grievance and Harassment and Bullying Policies and other specifically laid down statutory reporting procedures.

7. Scope

This procedure applies to all RISDA-Bangladesh employees, including Associates and contractors. This procedure does not replace other RISDA-Bangladesh policies or procedures. For example, if an employee has a grievance about their working conditions they should use the RISDA-Bangladesh Grievance Policy or, if they felt that their manager or a colleague was treating them unfavorably, they should use the RISDA-Bangladesh Harassment and Bullying 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 line manager, or if that is not possible, with the ED, Chairman of Executive Committee or through the RISDA-Bangladesh's whistle blowing policy.

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

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorized use of public funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users
- Abuse of authority
- Other unethical conduct

8. Reporting

RISDA-Bangladesh recognizes 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 RISDA-Bangladesh and/or to those for whom the RISDA-Bangladesh or they are providing a service. RISDA-Bangladesh will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimization.

Contact Details for Reporting: Head of HR & Administration Section, RISDA-Bangladesh head office, House #18, Road# 1, Block # B, Section # 6, Mirpur, Dhaka-1206.

9. 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 RISDA-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. RISDA-

Bangladesh will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation.

10. 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 ED/Treasurer of Executive Committee. 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

11. 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).

12. 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 ED
- Treasurer of Executive Committee

If either of the above receive an allegation he/she will consider the allegation and may discuss with either the ED or other EC Members. 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.

13. 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.

14. 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.

15. Timetable

- An acknowledge the allegation in writing within 10 working days with
 - An indication of how RISDA-Bangladesh propose to deal with the matter
 - An estimate of how long it will take to provide a final response
 - An indication of whether any initial enquiries have been made
 - 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 RISDA-Bangladesh will be unable to communicate what action has been taken.

16. Support

The RISDA- Bangladesh 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 RISDA- Bangladesh will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available. RISDA- Bangladesh 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.

17. 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.

18. 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.

19. Conclusion

Whistleblowing Policy of RISDA-Bangladesh 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 Executive Committee. HR & Administration 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, RISDA-Bangladesh 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 RISDA-Bangladesh. The employees of RISDA-Bangladesh can recommend any amendment/inclusion/exclusion to the committee /consultant. If possible, one female staff will be included in the committee. All types of amendment/ inclusion/exclusion will be done subject to prior approval of Executive Director.