



Global Whistleblowing Policy

Introduction

All Health Poverty Action staff have the Duty to Report any known or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behaviour, which are in direct breach of the Health Poverty Action Code of Conduct and the Key Health Poverty Action Policies. The failure to report any breach of the above-mentioned policies causes the proliferation of dangerous behaviour contrary to Health Poverty Action principles and values and the victimization of innocent people. Health Poverty Action has a policy of zero reprisal for whistle-blowers when an accusation is made in good faith.

All complaints or concerns must be brought to the attention of the relevant persons using the tools and channels described below, such as the email addresses fraud@healthpovertyaction.org (the tool for **reporting fraud**) and report@healthpovertyaction.org (the tool for **reporting any serious complaints when other standard channels were exhausted**). In order to protect the rights of Health Poverty Action staff and to maintain a dignified working environment free of any potential harassment, abuse and exploitation, Health Poverty Action management has the **Duty to Investigate** any complaint or concern raised by Health Poverty Action employees through the channels described below.

Who can raise concern under this policy: full time and part time Health Poverty Action staff, volunteers, interns, consultants and people working on behalf of Health Poverty Action – future referred to as “Health Poverty Action staff”, and Health Poverty Action beneficiaries.

The disclosure channels for both Health Poverty Action staff and beneficiaries are outlined separately below.

What should be reported: any serious concerns or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behaviour, which are in direct breach of the *Health Poverty Action Code of Conduct* and the *Key Health Poverty Action Policies* or that:

- make you feel uncomfortable in terms of known standards;
- are not in keeping with Health Poverty Action policies;
- fall below established standards of practice; or
- are improper behaviour.

The above mentioned might relate to:

- conduct which is an offence or a breach of law or Health Poverty Action policies;
- safeguarding risks including exploitation, abuse of power, and inappropriate behaviour including: bullying; verbal, physical or sexual harassment; rape; exploitation; intimidation; victimisation; racial or ethnic discrimination or harassment; behaviour that shows a lack of respect for the dignity of others; behaving in an obviously culturally insensitive manner

- possible fraud or corruption or misuse of finances;
- damage to the security, safety, health or environment;
- grievance, bullying, harassment;
- other unethical behaviour;
- attempts to conceal with any of these.

This list is not exhaustive and should be understood in conjunction with potential concerns covered in the *Health Poverty Action Code of Conduct* and the *Key Health Poverty Action Policies*

Basic principles

Confidentiality

Health Poverty Action treats all complaints or disclosures in a confidential and sensitive manner. The identity of the complainant is kept confidential as long as it does not hinder the investigation process. Consequently, **this Policy encourages individuals to put their name under any complaint or disclosure**. As the anonymous complaints or disclosures are less credible, the standard procedure cannot be fully followed.

Protection

If the complainant makes an allegation in good faith, which is not confirmed by the subsequent investigation, no action will be taken.

If a Health Poverty Action staff member makes an intentionally malicious or false accusation or otherwise misuses the channels described below, he/she will face disciplinary action.

If it is established that a complaint has been made maliciously, in bad faith or without serious intent by a beneficiary, then a response will be made to the complainant explaining why their complaint is not being taken further. Facts will be explained and situation will be clarified with relevant local leaders, community members and authorities/partners.

There will be zero reprisal for complainants when an allegation is made in good faith.

The complainant, the subject of the complaint and any other person assisting the investigation will be protected against any form of intimidation, threats, reprisal or retaliation resulting from the alleged incident. If any Health Poverty Action staff member is found intimidating them, a disciplinary action - up to and including dismissal - will be imposed.

Due process

The rights of all parties involved in an internal administrative investigation will be respected and they will be at all times treated with **respect and dignity**. All employees who are the subject of an investigation will be given:

- full notice of any formal allegation made against them
- the explanation of the investigation process
- the opportunity to explain and/or reply to any formal allegation made against them before any disciplinary action will be taken
- the presumption of innocence throughout the investigation
- the right to a full, fair, impartial, thorough and objective investigation of the allegation(s) without undue delay
- confidentiality in the conduct of the investigation

Any intentionally false or malicious statements or accusations against another staff member or third party, a lack of cooperation (including breach of confidentiality) or an undue interference with the investigation will be considered as gross misconduct and will result in disciplinary or other appropriate action.

Duty to report

As enshrined in the *Health Poverty Action Code of Conduct*, Health Poverty Action staff has the obligation to report all breaches of *Health Poverty Action Code of Conduct and Key policies*. Complaints should be reported through the channels described below. Health Poverty Action welcomes feedback and will treat all complaints and disclosures confidentially, seriously and promptly.

Disclosure channels for Health Poverty Action employees

1. Standard disclosure channel

All complaints and disclosures should be addressed to the line manager of the person submitting the complaint.

In case the complaint or disclosure of a malpractice does not originate from Health Poverty Action staff (i.e. coming from an associate, partner etc.), **the Health Poverty Action staff member receiving the complaint is obliged to act as the complainant and the information must be passed as soon as possible to his/her line manager¹** (one of the line managers he/she trusts). Such information must not be intentionally concealed.

If the Complainant is unable to read or write, the line manager receiving the complaint will take notes during the verbal complaint and read the notes back to the Complainant. The Complainant will then be asked to put a finger print to indicate their signature. The line manager will also ask an independent observer² to witness and sign the complaint to indicate that it is an accurate record of the complaint.

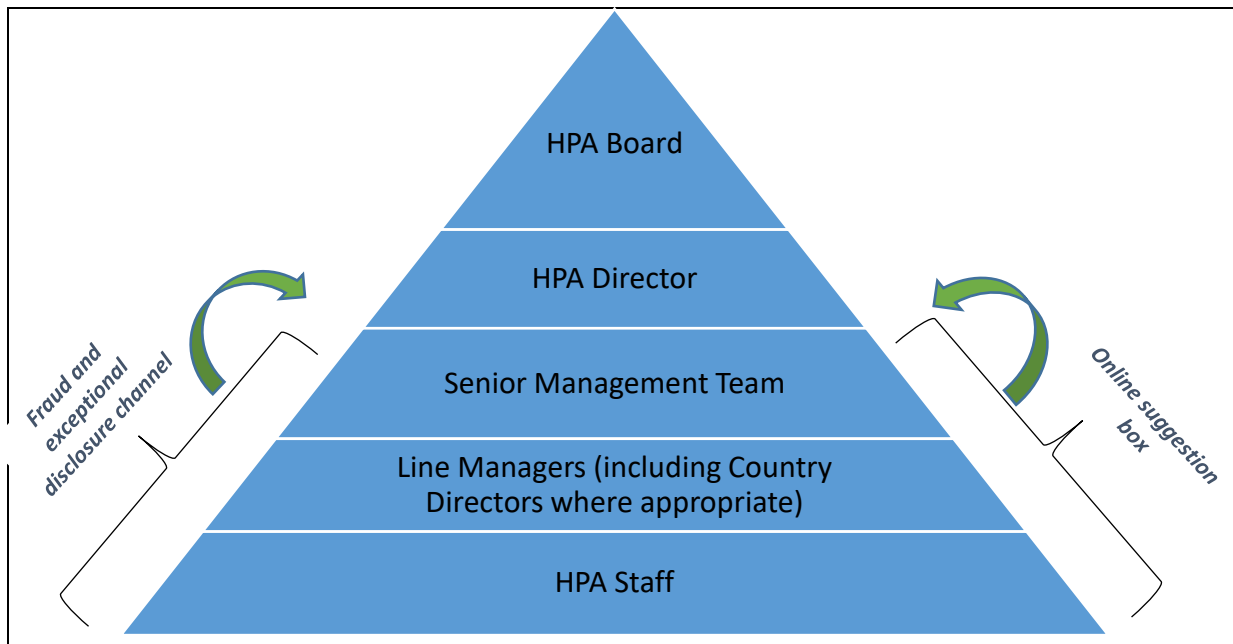
2. Whistleblowing principle and disclosure channel

The complaints concerning the line manager of the complainant should be directed to the higher-rank manager, according to the schema below.

In line with Health Poverty Action's open-door approach and the effort to solve – rather than to conceal – different forms of unacceptable behaviour, **whistleblowing is seen as an act of personal courage** based on loyalty to the organization and its ethical principles. It is expected that Health Poverty Action staff will use the whistleblowing principle prior to the possible airing of their complaints outside Health Poverty Action.

¹ Line manager = the person with direct managerial responsibility for a particular employee according to Organigram

² The observer will be any Health Poverty Action employee not involved in the investigation process, randomly chosen.



3. 'Sexual exploitation and abuse disclosure channel'

If the complaint concerns Sexual exploitation and abuse (SEA), a female/male manager should be consulted, as it would be appropriate considering the complainant sex, even if it is not her/his line manager or, if present, to the SEA focal point.

4. 'Fraud' disclosure channel

Any complaint and disclosure regarding fraud should be sent to fraud@healthpovertyaction.org. This channel, **linking employees directly to the Senior Management Team (SMT)** at the HQ facilitates the detection of financial malpractice, which, if occurred, might prejudice Health Poverty Action or any of its stakeholders. **The preferred language of communication is English, but it is possible to submit complaints in any language.**

The Senior Management Team in consultation with the Head of Finance and Administration will decide on the merits of the complaint/disclosure.

5. Exceptional disclosure channel

If other standard routes are inconvenient, non-applicable or were exhausted, concerns regarding **serious internal cases of unethical, dangerous or illegal practices** should be sent to report@healthpovertyaction.org. This channel, **linking employees directly to the Finance and Administration department** at the HQ facilitates and accelerates the detection of the types of behaviour, which, if occurred, might prejudice Health Poverty Action or any of its stakeholders. **The preferred language of communication is English, but it is possible to submit complaints in any language.**

The Finance and Administration department in consultation with the Senior Management Team will decide on the merits of the complaint/disclosure. When dealing with a complex complaint, they **may decide to transfer the complaint management to an external independent organization.**

6. Suggestions / complaints box

If the person who wants to make a suggestion or a complaint considers the above-mentioned channels inadequate, he/she can use the **suggestion box available online**, which is found in the following link: <https://forms.office.com/Pages/ResponsePage.aspx?id=bDytkcSWokW0gRQQ4qZed5g4x3t1x-xGtBzSU3qFvpxUN05NV0g4UDBaNIFJSFdWWDZRVehESIRQQi4u>

Please see Annex 1 for the online HPA Suggestions and Feedback form.

The suggestions / complaints will be reviewed monthly by two employees of the Finance and Administration Department. Each month, any suggestions or complaints received online will be logged (see Annex 2).

The Head of Finance and Administration department will keep evidence of suggestions and complaints received.

Disclosure channel for Health Poverty Action beneficiaries

Health Poverty Action acknowledges that enabling beneficiaries and project stakeholders to seek and receive response for grievances and alleged harm is a critical aspect of accountability. Thus, Health Poverty Action beneficiaries are encouraged to share their complaints, comments and feedback through any Feedback Beneficiary Mechanism (FBM) that has been made available to them. This formal mechanism, described in the **FBM Policy**, provides a safe, accessible and effective channel for Health Poverty Action's beneficiaries and project stakeholders to raise complaints and feedback and for a response or redress to be given and enables Health Poverty Action to understand the project from the beneficiaries' perspective.

Duty to investigate

Health Poverty Action country management and the Senior Management Team in London are responsible for responding to any complaint addressed to them through the above-mentioned channels. Their reaction to a complaint shall result in a confidential, sensitive, thorough and prompt internal administrative investigation, respecting the principles described in this policy. **All Health Poverty Action employees must cooperate fully and in good faith with an internal administrative investigation.**

The scope of the internal administrative investigation

The internal administrative investigation will be conducted in cases of allegations including, but not limited to:

- Financial malpractice, corruption or fraud
- Failure to comply with legal obligations or statutes
- Dangers to the health, safety, security or the environment
- Grievance, Bullying, Harassment
- Sexual exploitation and abuse
- Criminal activity
- Improper, unethical or unacceptable behaviour in conflict with the Health Poverty Action Code of Conduct and other policies on the organizational or department level
- Attempts to conceal any of these

This list is not exhaustive.

Once a complaint is received through any of the above-mentioned channels, the provisions of the **Investigation Guidelines** should be followed.

It should be noted that the internal administrative investigation **does not substitute a criminal investigation**. In any case in which a crime appears to have been committed, consideration will be given to informing national authorities.

Investigation guidelines

The *Investigation Guidelines* are to be used as a practical guide for **all managers/heads of departments who received a complaint and for Lead Investigation Officers (LIO) in order to conduct internal administrative investigation** of allegations against employees of Health Poverty Action or against anyone working for or on behalf of Health Poverty Action. They include detailed information about Health Poverty Action investigative methods and procedures.

For further information about the investigation guidelines, kindly refer to the *Investigation Guidelines*.

Health Poverty Action response to breaches

In cases of substantial breaches of the *Health Poverty Action Code of Conduct* and *Key Health Poverty Action Policies*, Health Poverty Action will take immediate and appropriate action and will support the needs of those affected. This might include:

HPA full or part-time staff	disciplinary action up to dismissal
HPA volunteers and interns	action up to termination of contract
HPA consultants	termination of contract
Visitors to HPA	action up to suspension of support for the visit
HPA associates	termination of contract
HPA partner organisation	action up to withdrawal of funding or support and/or termination of partnership agreement

Depending on the nature and the circumstances of the case, Health Poverty Action might involve appropriate authorities to ensure the protection of Health Poverty Action staff, associates and/or beneficiaries.

Support from the Health Poverty Action HQ

Investigations by their nature can be complex, tense and stressful for all parties involved. Therefore, Health Poverty Action is committed to provide a continuous support to all parties involved in an investigation.

Staff who require any assistance or guidance during the investigation process are encouraged to contact:

The **Finance and Administration Department** (hpafinance@healthpovertyaction.org) for any procedural matters regarding an investigation

The **Office Manager** (t.woolfenden@healthpovertyaction.org) for any personal and human-resources-related matters regarding an investigation. The Office Manager should also be contacted in order to request a professional psychological support during the investigation process, if needed.

The **Head of Programmes – Africa** (tadesse@healthpovertyaction.or.ke) for any other serious matter.

The requests can be written in any language – the translation will always be provided.

Internal Reporting Structures

Independent of the disclosure channel outlined above, all breaches of the *Health Poverty Action Code of Conduct* and *Key Health Poverty Action Policies* or complaints made against Health Poverty Action or their staff will be centrally recorded and stored in a register managed by the Head Office Safeguarding Officer.

Annual reports will be generated and presented to the Finance and Audit Committee.

Annexes

Annex 1: HPA Suggestions and Feedback Form

HPA Suggestions and Feedback Box

Welcome to the HPA Comments and Feedback Box!

This is a space where you can anonymously send us your ideas and comments for HPA, helping to develop solutions to challenges and to maintain and create a good working culture and environment. We are really interested to hear your ideas and welcome all suggestions that will help make a positive change.

All submissions are anonymous unless you would like to include your name, in which case space to do that has been provided.

* Required

1. Name (please leave this box blank if you would rather remain anonymous)

2. Please provide a summary of your suggestion

3. What do you think the benefits of it might be? *

4. Anything else you'd like to add?

Submit

Annex 2: Suggestions / complaints box Log

No.	Received date	Names of staff who reviewed the online suggestion box	Content / details
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Annex 3: Pledge of Confidentiality template

*I agree to exercise the utmost discretion with regard to my involvement in Suggestions / Complaints box from HQ level. I shall hold secret all information known to me as a result of my involvement in opening and managing the content of the Suggestions / Complaints box and I will not discuss any information gained in this process with **anyone** other than the persons who are authorized to receive it.*

I understand that this declaration will remain in force after my involvement in the process is complete. I also understand that divulging confidential information to persons who are not authorized to receive it may amount to misconduct and that the signed original of this declaration will be held in the relevant file.

Name _____ Title _____

Signature: _____ Date and place: _____