

## Forum for Protection of Public Interest (Pro Public)

### Whistleblowing Guidelines of Pro Public, 2022

#### A. Introduction

Whistle-blowing system of Pro Public aims to reinforce the organization's commitment to conducting its business with honesty and integrity and to comply with its policies, values, attitudes and behaviors. This guideline applies equally to all units and partners of Pro Public. The system provides a channel for reporting of suspected wrongdoing as quickly as possible, in the knowledge that concerns will be taken seriously and investigated appropriately and, in a way, which ensures that those who raise genuine concerns can do so without fear of reprisals.

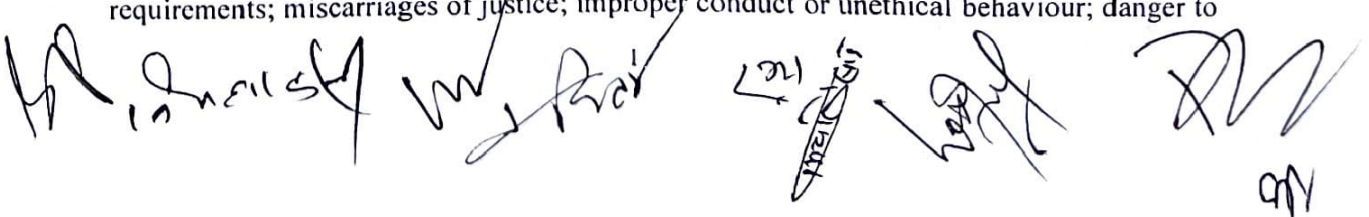
#### B. Aims & Scope of these Guidelines

This policy aims to:

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

#### C. Policy

1. This Policy applies to all activities and operations of Pro Public, including projects and programmes funded by donor partners as well as those implemented by partner organisations.
2. The policy encourages anyone to whom it applies to report wrongful acts committed by anyone involved in the activities and operations of Pro Public.
3. The Whistle-blowing Procedure sets out the framework for dealing with allegations of illegal and improper conduct.
4. This procedure does not replace other policies and procedures such as the Pro Public Code of Conduct, the complaints procedure, the Grievance handling and other any policies with specifically laid down statutory reporting procedures but will complement such procedures.
5. Wrongful acts in this sense may include, but are not limited to; criminal activity; failure to comply with any legal or professional obligation or regulatory requirements; miscarriages of justice; improper conduct or unethical behaviour; danger to



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health and safety; damage to the environment; bribery under the organisation's Anti-Fraud and Corruption Policy; financial fraud or mismanagement; participation in or facilitation of criminal tax evasion breach of the Organisation's policies and procedures; conduct likely to damage the Organisation's reputation or financial wellbeing (or that of its subsidiaries); unauthorized disclosure of confidential information; negligence; harassment, bullying; sexual harassment; sexual exploitation and abuse; child or adult at risk abuse; modern slavery or trafficking; discrimination (e.g. against someone on the basis of their race or gender); manager/employee relations; abuse or excessive use of power; abuse of trust; fraudulent procurement; undeclared conflict of interest; the deliberate concealment of any of the above wrongful acts.

- 6. A Whistle-blower is any person who raises a bona fide or genuine concern relating to any of the above wrongful acts, including wrongful acts which may or may not be explicitly covered in the policy, but which may nevertheless be considered a violation of Pro Public code of conduct.
- 7. Should Whistle-blower acting in good faith face any direct or indirect victimization, including any form of retaliation, then disciplinary measures or further actions will be taken against any such victimizers or wrongdoers.
- 8. Members of staff whilst still in the employment of the organization are encouraged to report any wrongful act whenever possible.

**D. What should not be reported under this Whistle-blowing policy?**

Complaints relating to personal circumstances in the workplace or to terms of employment (excluding the aforementioned wrongful acts listed above) should not be reported under the Pro Public Whistle-Blowing policy.

**E. Responsibility for the Policy**

The relevant sub-committee of the Board of Pro Public has overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. Policy awareness sessions must also be carried out with all staff

**F. Reporting a Case**

All Pro Public Staff are encouraged to report wrongful acts or suspected wrongful acts in accordance with this Whistle-Blowing policy, and in line with the Pro Public Code of Conduct. Members of staff of partner organizations may also report such wrongful acts committed by Pro Public staff in the execution of their partnership agreements.

**G. Confidentiality**

- 1. Cases may be reported on a confidential basis or may be reported anonymously using the email address [propublic2017@gmail.com](mailto:propublic2017@gmail.com) & which will be monitored by the Executive Director

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and must be submitted within 7 working days of the decision to the relevant investigating body.

**K. Notification**

All the members, staff and partners are required to notify and communicate the existence and contents of this policy

**Policy Records:**

Approved from the Executive Committee Meeting Held on February 13, 2022

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