



SAVE THE CHILDREN INDIA

WHISTLE- BLOWING POLICY

Version No. 2 – Policy approved/ revised as per Resolution passed in Annual General Body meeting held on 8th September 2023

1. Introduction

The Whistle Blowing Policy of Save The Children India aims to reinforce the organization's commitment to its values, attitudes, and behaviours. The purpose of this policy is to provide an effective procedure for people to raise their concerns when they believe that abuse (including physical and sexual in nature), serious malpractice or professional misconduct has taken place, which will involve any actual or potential violation of the Organizational Code of Conduct, Behaviour at Work Policy, Child Protection Policy (CPP) and CPP Code of Conduct, Protection from Sexual Exploitation and Abuse (PSEA) Policy, and Policy against Sexual Harassment at Workplace (POSH) Policy, and all other organizational policies.

2. About the Policy

- 2.1.** This policy applies to all staff of Save The Children India and those of Partner organizations, beneficiaries (including children and adults), as well as Vendors and Vendor organizations who are in a relationship with Save The Children India.
- 2.2.** The policy covers the responsibility to report all wrongful acts committed by staff of Save The Children India, partners and members of the Governing Council only to the Program Directors and in case the Program Directors are involved in the case, then to the CEO. Program Directors / the CEO (as required) are officially appointed to receive complaints, and initiate the investigation and will be referred to as the Ombudsperson in reference to this Policy. They will also keep track of all reported cases and report the same to the Board.
- 2.3.** All cases that violate the organizational Child Protection Policy (CPP), the Protection from Sexual Exploitation and Abuse (PSEA) Policy, the Policy against Sexual Harassment at Workplace (POSH), and the organizational Code of Conduct shall be



reported to personnel in accordance with the reporting procedures laid down in the said policies.

2.4. Abuse, Serious Malpractice, Professional Misconduct includes but is not limited to:

- Theft of official inventory including data gathered during the course of official engagements.
- Financial and procedural malpractice including those relating to mismanagement; misappropriation of funds; actual or suspected fraud or abuse of authority.
- Falsification of organizational records for personal gain or gain for others on the part of Staff, partners and members of the Governing Body.
- Engagement and/or participation in any capacity in any acts or behaviors that violate the organizational Child Protection Policy.
- Attempting to cover up any of the above and /or being aware of a misconduct or misuse and not reporting it.
- Engagement and/or participation in any capacity in any acts or behaviors that violate the organizational Policy for Protection from Sexual Exploitation and Abuse (PSEA) and the Policy against Sexual Harassment at Workplace (POSH) and the organizational Code of Conduct and Behavior at Work Policy.

3. Reporting Responsibility

It is obligatory for all of Save The Children India staff to report wrongful acts or suspected wrongful acts in accordance with this Whistle-Blowing policy.

4. Levels at which the Concerns will be Raised

Any member of the staff or partners believing they have suspicion or evidence of serious misconduct on the part of anyone associated with the organization, should in the first instance bring the matter to the attention of the appointed Ombudsperson. The Ombudsperson will be responsible for ensuring that the case is dealt with **as per the concerned internal policies of the organization. For example, if the reported case falls under 'sexual harassment at the workplace', such case will be dealt in accordance with the organization's Policy against Sexual Harassment at Workplace, if the reported case falls under 'sexual abuse and exploitation', it will be dealt in accordance with the Protection from Sexual Abuse and Exploitation Policy, and so on.**



5. Role of the Whistle Blower

5.1. The Whistle Blower's role is that of a reporting party with reliable information through Protected Disclosure. Protected Disclosure means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. The Whistle Blower(s) is/ are not required or expected to act as investigators or fact finders, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.

5.2. The Whistle Blower shall have a right to be informed of the disposition of his/ her disclosure except for overriding legal or other reasons.

6. Procedures: Essentials and Handling of Protected Disclosure

6.1. The Protected Disclosure should be attached to a letter bearing the identity of the Whistle Blower, i.e.; their name, designation, and address, and should be inserted in an envelope which should be closed/ secured/ sealed.

6.2. The envelope thus secured/ sealed should be addressed to the Ombudsperson and should be superscribed "**Protected Disclosure**".

6.3. If the Whistle Blower believes that there is a conflict of interest between the Ombudsperson and the Whistle Blower, they may send their protected disclosure directly to the Board of the organization.

6.4. Protected disclosure should either be typed or written in legible handwriting in English/ Hindi/ Marathi and should provide a clear understanding of the improper activity involved or issue/ concern raised.

6.5. The reporting should be factual and not speculative in nature. It must contain as much relevant information as far as possible to allow for preliminary review and proper assessment.

6.6. The Ombudsperson shall weed out frivolous/ motivated complaints and the protected disclosure(s)/ bonafide complaints which require further investigation shall be forwarded to the investigator(s) nominated for this purpose.

7. Confidentiality

7.1. The Whistle Blower will be accorded protection from victimization, or any other hostile behavior. But 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.

- 7.2. The confidentiality of the 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.

8. Handling of Protected Disclosure by the Ombudsperson

- 8.1. The Ombudsperson who receives such report will acknowledge receipt of the report within five working days.
- 8.2. All reports should be properly investigated by the Ombudsperson through an external team for investigation as appropriate and in accordance with the concerned policies of the organization.
- 8.3. 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.
- 8.4. Upon completion of the investigation, the Management should take the appropriate corrective action as warranted by the outcome of the investigation and recommended by the Ombudsperson.
- 8.5. The Whistleblower would also be notified of the outcome of the investigation whenever it is possible to do so.
- 8.6. There may be occasions when external bodies such as donors and regulators may also be notified of the outcome of an investigation.
- 8.7. On an annual basis, issues raised through whistle-blowing will be tracked and reported to the Board by the Ombudsperson.



9. Protection and Non-Retaliation

- 9.1.** No unfair treatment will be meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under this Policy. Save The Children India condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. Thus, if the Whistle Blower is required to give evidence in criminal, or disciplinary proceedings, Save The Children India will arrange for the Whistle Blower to receive advice about the procedure, etc. Expenses incurred by the Whistle Blower in connection with the above, towards travel, etc. will be reimbursed as per the normal entitlements.
- 9.2.** The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law. In case the Whistle Blower discloses his/ her identity, Save the Children India would provide protection against retaliation.
- 9.3.** The Whistle Blower shall have the right to protection from retaliation. But this will not extend to immunity for complicity in matters that are the subject of allegations and investigation.
- 9.4.** Any other employee indirectly assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.
- 9.5. Grievance:** If the Whistle Blower feels aggrieved with the disposition of his/ her complaint or if the Whistle Blower feels that protection, which he/ she is entitled to has not been provided, the Whistle Blower may make a representation in writing of his/ her grievance to the CEO or in case of grievance with the CEO, to the Board who will take such action in the matter as they consider necessary to redress the grievance.

10.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.



11.Prevention of Reporting

If some person tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, Save The Children India will take this to be a serious disciplinary misdemeanor and this instance will be investigated in accordance with Disciplinary Policy.

12.Anonymous Reporting

Anonymous reporting is not to be encouraged, but this is likely to occur from time to time. In all such cases, while not taking formal cognizance of such reporting, Management may choose to ascertain all the verifiable facts mentioned in such reporting. If facts verified are found to sustain the allegation, formal proceedings may be initiated.

13.Notification

All 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.

14.Retention of Documents

All Protected Disclosures in writing or documented along with the results of the investigation relating thereto, shall be retained by Save The Children India for a minimum period of 3 years.

ACKNOWLEDGMENT AND AGREEMENT REGARDING THE WHISTLE BLOWING POLICY

This is to acknowledge that I have received a copy of the organization's Whistle Blowing Policy.

Employee's signature

Employee's Name [printed]

Date