



*Her Rights, Her Legacy*



**THE ALLIANCE OF WOMEN ADVOCATING FOR CHANGE**

**AWAC WHISTLE-BLOWER POLICY**

**OCT 2024**

Located Off Balintuma Road, On Nabulagala Road, Plot 10, 1<sup>st</sup> Black Gate on your left. Mengo-Rubaga Division Kampala City. P.O BOX 31762, Uganda; Tel; +256(0)392 8 81 454/+256(0)774 603 754; AWAC-Malaika Toll-free Center: 0 800 333 177; Email; [awacuganda@gmail.com](mailto:awacuganda@gmail.com); Twitter; <https://twitter.com/@awacuganda>; Website; <http://www.awacuganda.org>; Face book; <https://www.facebook.com/allianceofwomenadvocatingforchange>;

## AWAC WHISTLE-BLOWER POLICY

On behalf of The Alliance of Women advocating de Change (AWAC) Board Members (BM), we hereby certify that this **AWAC Whistle-Blower Policy** has been duly passed and adopted as part of the Corporate Governance Policies of AWAC.

**Signed and sealed this 6<sup>th</sup> Day of Oct 2024**



**IMMACULATE B. OWOMUGISHA**  
BOARD CHAIRPERSON  
AWAC BOARD OF DIRECTOR



**KYOMYA MACKLEAN**  
EXECUTIVE DIRECTOR & SECRETARY TO THE BOARD

**DATE:** 6<sup>th</sup> Oct 2024

**PLACE:** At AWAC Office

## AWAC WHISTLE-BLOWER POLICY

### Introduction,

### Back ground and policy context

AWAC is committed to upholding the highest ethical standards in all aspects of its operations. This commitment extends beyond compliance with applicable laws and regulations; it encompasses the cultivation of an organizational culture where integrity, transparency, and accountability are paramount. We recognize that ethical behavior is the foundation of our mission and that fostering an environment of trust is essential for effective governance and decision-making. To achieve this, AWAC encourages all stakeholders—employees, volunteers, board members, and beneficiaries—to voice concerns regarding potential wrongdoing, unethical conduct, or violations of policies without fear of retaliation. We believe that open communication is vital for maintaining ethical standards and ensuring that any misconduct is addressed promptly and appropriately.

This Whistleblower Policy provides clear procedures for reporting suspected misconduct in a confidential and secure manner. It outlines the responsibilities of those involved in the reporting and investigation processes while emphasizing our dedication to protecting whistleblowers. All reports will be taken seriously, thoroughly investigated, and resolved in accordance with established protocols. By implementing this policy, AWAC aims to uphold its integrity, reinforce its commitment to ethical conduct, and ensure that all stakeholders feel empowered to speak up when they encounter unethical behavior.

Whistleblowing is a critical mechanism for promoting ethical behavior within organizations, particularly in the context of non-governmental organizations (NGOs). Defined as the act of reporting unethical, illegal, or harmful conduct within an organization, whistleblowing typically involves employees, volunteers, or stakeholders who witness misconduct and choose to speak up, even at personal risk. This reporting can encompass various issues, including financial fraud, safety violations, harassment, discrimination, and other unethical behaviors that could harm individuals or the organization itself. By encouraging whistleblowing, organizations can identify and address issues before they escalate into larger problems, fostering a culture of transparency and accountability. This culture is not just beneficial for the organization but also plays a significant role in protecting the interests of stakeholders—such as employees, beneficiaries, and donors—by preventing harm that could arise from unethical actions.

For NGOs, the rationale for establishing robust whistleblowing mechanisms becomes even more pronounced. Operating often in complex environments, NGOs are susceptible to unique vulnerabilities such as corruption, mismanagement, and ethical dilemmas, particularly when working with marginalized communities or in low-resource settings. These challenges heighten the need for accountability and

transparency, especially given that NGOs heavily rely on public trust and donor funding. A comprehensive whistleblowing policy signals to stakeholders that the organization is committed to ethical standards and is willing to hold itself accountable for its actions. Many donors also require NGOs to have whistleblowing policies in place to mitigate risks associated with financial misconduct, further underscoring the importance of such mechanisms in maintaining funding and support. Additionally, establishing protective measures for whistleblowers is essential to alleviate fears of retaliation. This includes ensuring confidentiality and providing a safe reporting environment, encouraging individuals to come forward with their concerns without fear of repercussions.

Fostering an environment where whistleblowing is valued not only enhances operational integrity but also strengthens the organization's mission. When individuals within the NGO feel empowered to speak up about wrongdoing, it encourages a culture of ethical behavior that permeates the entire organization. Furthermore, whistleblowing can lead to significant improvements in policies and practices, ensuring that the NGO operates effectively and ethically in alignment with its mission. Such proactive measures not only safeguard the organization's reputation but also enhance its ability to fulfill its objectives, ultimately leading to better outcomes for the communities they serve. By committing to whistleblower protections and creating a supportive environment, NGOs can reinforce their dedication to integrity, making them more resilient in the face of challenges while promoting a culture of accountability and trust within their organizations.

A whistleblower is anyone who reports an activity they believe to be illegal, unethical, or fraudulent related to AWAC's operations, finances, or conduct. This includes, but is not limited to:

- **Violations of laws, regulations, or AWAC policies:** Any act that contravenes local, state, or federal laws, or AWAC's internal guidelines.
- **Financial misconduct:** This can encompass fraudulent expense claims, misappropriation of funds, falsification of financial records, or any other deceptive financial practices.
- **Abuse of power or authority:** Instances where an individual misuses their position for personal gain or to harm others within the organization.
- **Harassment, discrimination, or unfair treatment:** Any behavior that creates a hostile work environment, including but not limited to sexual harassment, racial discrimination, or other forms of unequal treatment.
- **Safety hazards or risks to the public or organization:** Reporting any conditions that pose a risk to the health and safety of employees, clients, or the general public, including unsafe working conditions or non-compliance with safety regulations.

### 3. Reporting Procedures

AWAC is committed to facilitating accessible and effective reporting mechanisms for all stakeholders who wish to report suspected misconduct. We recognize that providing multiple avenues for reporting not only enhances transparency but also ensures that everyone feels safe and supported in bringing forth their concerns. The following reporting procedures have been established to accommodate various preferences and circumstances:

#### 1. Email Reporting:

- Stakeholders can also report misconduct via email to [ethicsugandaawac@gmail.com](mailto:ethicsugandaawac@gmail.com). This channel allows for confidential submissions that will be monitored by the Executive Director and Ethics Committee lead by Chairperson of the Board.
- Email reports should include as much detail as possible to aid in the investigation process.
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#### 2. Suggestion Boxes:

- AWAC established suggestion boxes located at AWAC secretariate and AWAC regional offices to facilitate anonymous reporting. These boxes are regularly checked by designated personnel to ensure timely action on any reported concerns.
- Stakeholders are encouraged to utilize these boxes as a safe means of expressing their concerns.
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#### 3. Directly to the Ethics Committee:

- Stakeholders have the option to submit a written report directly to a designated member of AWAC's Ethics Committee. This can be done in person or through secure digital channels, ensuring the privacy of the submission.
- When submitting a report, stakeholders are encouraged to provide as much detail as possible to facilitate a thorough investigation. The Ethics Committee member receiving the report will acknowledge receipt and outline the subsequent steps in the investigation process.
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#### 4. Toll-Free Reporting Line:

- AWAC also runs Malaika Toll-free number: **0-800-333-177** provided to all community and other stakeholders where they can call to report misconduct anonymously and confidentially. This ensures that all stakeholders have an accessible means to raise their concerns without any associated costs.
- The toll-free line is monitored by trained personnel who are dedicated to handling reports sensitively and promptly.
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#### 5. Awareness Raising and Communication of the Policy

AWAC recognizes the importance of fostering a culture of transparency and accountability. To ensure all stakeholders are aware of the reporting procedures and their rights, the following awareness-raising platforms will be employed:

- **Training Sessions:** Regular training and refresher courses will be conducted to educate all staff, volunteers, and beneficiaries about the Whistleblower Policy and the importance of reporting suspected misconduct.
- **Posters and Flyers:** Informative posters and flyers will be displayed in key areas within AWAC's offices and community centers, outlining the reporting procedures and emphasizing the protection against retaliation for whistleblowers.
- **Meetings:** Team meetings and community gatherings will be utilized to discuss the Whistleblower Policy, ensuring that stakeholders understand how to report misconduct and feel empowered to do so.
- **Annual Reports:** AWAC will provide annual reports to all stakeholders summarizing the types of reports received, actions taken, and the outcomes of investigations to enhance transparency and build trust in the reporting process.

## 6. Reporting Expectations

Good Faith Reporting: Reports should be made in good faith and based on a reasonable belief of wrongdoing. The whistleblower is encouraged to report only when they genuinely believe misconduct has occurred.

- Detailed Information: Whistleblowers should provide as much detail as possible, including:
- Nature of the alleged misconduct: Clearly describe what the misconduct entails.
- Individuals or departments involved: Identify who is involved to the best of your knowledge.
- Dates and locations of occurrences: Specify when and where the alleged misconduct took place.
- Witness testimonies or supporting evidence: Include any relevant documentation, emails, or witness accounts that may support the claim.
- Anonymity: Whistleblowers may remain anonymous if desired; however, they should understand that complete anonymity may not be possible during an investigation, especially if further information is required.

## 6. Reporting Responsibilities

- A whistleblower, as defined by this policy, is someone who reports an activity considered to be illegal or dishonest to one or more of the parties specified in this Policy. Examples of illegal or dishonest activities include;
- Violations of laws: Any action that contravenes legal statutes.
- Fraudulent financial reporting: Misrepresentation of financial data or results.
- The whistleblower is not responsible for investigating the activity or determining fault or corrective measures; this responsibility lies with appropriate management officials.

- If a stakeholder has knowledge of or a concern regarding illegal or dishonest fraudulent activity, they should contact their immediate supervisor or the Human Resources office. The HR office will immediately report the matter to the Executive Director (ED).
- The ED is responsible for initiating investigations into all reported complaints. They will evaluate the allegations and determine the appropriate course of action.
- Upon receiving a report, the ED will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.
- Stakeholders must exercise sound judgment to avoid baseless allegations. A stakeholder who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination. If the ED fails to respond adequately, the employee should escalate the issue to the designated board member.

## 7. Accounting and Auditing Matters

- The ED is responsible for launching an investigation and resolving reported complaints and allegations concerning violations. Depending on the severity of the violation, the ED may involve the Board for further guidance or oversight.
- The Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing.
- AWAC will provide an annual report to the Board detailing any violations and the actions taken in response.

## 8. Confidentiality

AWAC is committed to ensuring that all reports of violations or suspected violations are handled with the utmost confidentiality. Recognizing that the willingness of stakeholders to report misconduct is paramount, AWAC has established several measures to protect the identity and privacy of whistleblowers throughout the reporting and investigation process.

### **Confidential Reporting:**

- Stakeholders may choose to submit reports of violations or suspected violations confidentially or anonymously. Reports submitted confidentially will allow the complainant to disclose their identity while still ensuring that sensitive information is protected. In contrast, anonymous submissions will not require any identification from the whistleblower, fostering an environment where individuals can report concerns without fear of repercussion.
- AWAC encourages whistleblowers to provide as much detail as possible when reporting, but they should feel secure in knowing that their identity will not be disclosed unless they choose to reveal it.



### Protection of Whistleblower Identity:

- AWAC understands that fear of retaliation can deter individuals from reporting misconduct. Therefore, the identity of the whistleblower will be strictly protected during the investigation process.

### 9. Compliance with Legal and Policy Framework:

- AWAC's approach to confidentiality is aligned with the laws and regulations regarding whistleblower protections in Uganda, particularly the Public Interest Disclosure Act. This legislation emphasizes the importance of protecting the identity of whistleblowers who report misconduct in good faith, ensuring that individuals are not subjected to retaliation for their actions.
- In accordance with Ugandan policy, AWAC commits to protecting whistleblowers from any adverse actions as a direct result of their reporting, which includes harassment, discrimination, or any form of retaliation in the workplace or community settings. The law provides a framework for legal recourse should whistleblowers experience retaliation, reinforcing AWAC's dedication to a safe and supportive reporting environment.

### 9. No Retaliation

It is contrary to the values of AWAC for anyone to retaliate against any board member, officer, employee, or volunteer who, in good faith, reports an ethics violation or a suspected violation of law. Any form of retaliation, such as intimidation, harassment, or adverse employment actions against the whistleblower, will not be tolerated. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### 11. Reporting Retaliation:

- Any whistleblower who believes they have experienced retaliation as a result of their reporting should report the matter immediately through the established reporting channels. AWAC will take such claims seriously and conduct thorough investigations to address any incidents of retaliation appropriately.
- Protecting whistleblowers not only fulfills AWAC's ethical obligation but also serves to reinforce a culture of integrity, accountability, and transparency within the organization. By ensuring confidentiality and protection for those who come forward, AWAC fosters an environment where stakeholders can confidently report misconduct, knowing they will be supported throughout the process.

### 12. Handling of Reported Violations

The Executive Director /ethics committee will notify the sender and acknowledge receipt of the reported violation or suspected violation within **five business days**. All reports shall be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.



- The investigation process will include:
  - **Acknowledgment of Receipt:** The ED will acknowledge receipt of the report to the whistleblower.
  - **Formation of Investigation Team:** An investigation team will be formed, excluding individuals with conflicts of interest to ensure impartiality.
  - **Gathering Evidence:** The team will gather relevant evidence, including documentation, and conduct interviews with involved parties.
  - **Review and Analysis:** All gathered information will be reviewed and analyzed to determine the validity of the allegations.
  - **Resolution Process:** Based on the findings, the conflict resolution process may include actions such as recusal from decision-making, transparent procurement processes, and guidance for future conflict avoidance.
  - **Documentation:** All actions taken during the investigation will be documented thoroughly to ensure accountability and traceability.
  - **Outcome Communication:** Once the investigation is concluded, the whistleblower will be informed of the outcome, within the limits of confidentiality and privacy considerations.

## Policy Statement

AWAC requires all directors, officers, employees, and volunteers to observe high standards of business and personal ethics in their conduct. As representatives of the organization, it is imperative to practice honesty and integrity in fulfilling responsibilities and to comply with all applicable laws and regulations.

## Appendix I: Whistleblowing Report Form

**Purpose:** To provide a structured form for individuals to report unethical behavior or misconduct.

### Whistleblowing Report Form

#### Section Details

#### 1. Reporting Individual Details

Name (optional): \_\_\_\_\_

Position/Role: \_\_\_\_\_

Contact Information: \_\_\_\_\_

Date of Report: \_\_\_\_\_

#### 2. Details of the Allegation

Nature of the Misconduct (check all that apply):

-  Financial Fraud

-  Harassment

-  Discrimination

-  Safety Violation

-  Other: \_\_\_\_\_

Description of the Incident: \_\_\_\_\_

Date of Incident: \_\_\_\_\_

Location of Incident: \_\_\_\_\_

Names of Individuals Involved (if known): \_\_\_\_\_

Witnesses (if any): \_\_\_\_\_

### 3. Additional Information

Any supporting documents/evidence: \_\_\_\_\_

Preferred Outcome (if applicable): \_\_\_\_\_

4. Signature (optional): \_\_\_\_\_

**Note: This report can be submitted anonymously. All information will be treated confidentially.**

### Whistleblower Feedback Form

Section : Details

#### 1. Whistleblower Information

Name (optional): \_\_\_\_\_

Date of Report: \_\_\_\_\_

#### 2. Feedback

How satisfied were you with the reporting process? (1-5 scale) \_\_\_\_\_

Comments: \_\_\_\_\_

#### 3. Follow-Up

Would you like to be contacted for follow-up?

-  Yes

-  No

#### 5. Annex: List of Designated Whistleblowing Contacts