

WOMEN FUND TANZANIA TRUST

Whistle Blowing Policy

APRIL 2022

WFT-TRUST WHISTLE-BLOWING POLICY

Definitions

Whistle-blowing can be defined as the disclosure of information, a perceived wrongdoing in an organization, or the risk thereof, to individuals or entities believed to be able to effect action. For WFT-Trust wrongdoing is anything that violates its core principles and values.

Whistle-blowing is a term used to describe a situation in which an employee, trustee, volunteer or any other individual linked or associated with WFT-Trust raises a concern about possible malpractice, fraud, crime, danger, safeguarding or any other serious risk that could threaten primary actors, colleagues (staff members and volunteers), donors, the public or WFT-Trust's integrity and reputation.

The difference between a whistle-blowing issue and an employee grievance is that in the case of whistle-blowing, the concern is about a danger or illegality that has a public interest to it; a grievance or private complaint, by contrast, is a dispute about the employee's own employment position and has no additional public interest dimension.

The definitions of some of the key terms used in this Policy are given below:

- "This Policy" or "Policies" refers to the "Whistle-Blowing Policy."
- Whistle-Blower means an Employee or any other party making a Disclosure under this Policy.
- Alleged wrongful conduct- Unlawful / unethical / improper practice / act or activity.

Key actions that fall under activities that violate WFT-Trust's core principles and values 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 behavior;
- Danger to health and safety;
- Bribery under WFT-Trust's Anti-Fraud and Corruption Policy;
- Financial fraud or mismanagement;
- Breach of the Organization's policies and procedures;
- Conduct likely to damage the Organization's reputation or financial wellbeing;
- Unauthorized disclosure of confidential information;
- Negligence;
- Harassment;
- Bullying;
- Sexual harassment;
- Sexual corruption
- 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.

A whistleblower is any person who raises a bona fide or genuine concern relating to any of the above acts, including acts which may or may not be explicitly covered in the policy, but which may nevertheless be considered a violation of WFT-Trust 's code of conduct.

Should a whistleblower 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.

Members of staff whilst still in the employment of the organization are encouraged to report any wrongful act whenever possible.

1. Introduction

Women Fund Tanzania – Trust (WFT-Trust) is committed to providing adequate spaces and opportunities for misconduct to be reported, and swiftly acted upon.

The WFT-Trust whistleblowing system aims to reinforce the organization's commitment to delivering its mandate based on feminist principles and to comply with its policies, values, attitudes and behaviours. This policy applies equally to all staff, Trustees, grantee partners and all relevant stakeholders.

The purpose of this policy is to ensure that WFT-Trust provides adequate channels for reporting suspected and actual activities that go against WFT-Trust's core values and principles as quickly as possible. This is done 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.

2. Purpose

This policy aims to:

- Encourage all persons to feel confident about raising concerns about matters that undermine the integrity or credibility of WFT-Trust;
- Create appropriate channels for addressing any form of fraud, harassment, abuse, corruption, theft, illegal activity, or dishonesty within WFT-Trust;
- Provide avenues for any WFT-Trust stakeholder to report relevant actions that violate WFT-Trust's core principles and receive feedback on any action taken;

- Reassure any persons who report inappropriate behavior that they will be protected from reprisals for making an honest disclosure in accordance with this policy.
- Display the organization's commitment to honest practices, and responsible conduct of its employees, partners and stakeholders, and to recourse should these not be adhered to
- Ensure that WFT-Trust remains an organization with high standards, and that maintains the highest quality of integrity at all times.

3. 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 acts listed above) should not be reported under the WFT-Trust Whistle-Blowing policy. While WFT-Trust takes concerns relating to personal circumstances and terms of employment seriously they should be raised with the appropriate authority handling such concerns, by using the grievance procedure included within the Human Resources manual.

4. Roles and Responsibilities

The Executive Director and the Board of Trustees have overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under this policy. The Board of Trustees shall set the tone for all members to be aware of this policy, and to report any misconduct that undermines the integrity and values of WFT-Trust.

The Executive Director is responsible for creating a working culture that enables staff and others to raise concerns. The Executive Director should accordingly also ensure that grantee partners and relevant stakeholder who have contractual agreements with WFT-Trust are made aware of this policy. All partners and stakeholders should also be made aware of their responsibility to report any misconduct of WFT- Trust staff and their own staff in the execution of their duties, and the Executive Director will ensure that grantee partners and stakeholders are aware of the systems for reporting actions which go against WFT-Trust's values and principles

Human Resources Staff will ensure that policy awareness sessions are carried out regularly with all staff, at least once every six months, or upon joining the organization for the first time. Furthermore, HR policies should support recruitment of people with high level of integrity and professionalism.

The management with support of an external qualified legal advisor and the Human Resource team should review this policy from a legal and operational perspective every two years.

5. Reporting a Case

All WFT-Trust staff and stakeholders are encouraged to report proven or suspected misconduct in accordance with this Whistleblowing policy. Grantee partners and other stakeholders may also report such inappropriate acts committed by WFT-Trust staff or Board of Trustees, other grantee partners or their own staff, in the execution of their partnership agreements. Reports can be made as follows:

Secretariat and Partners

Any employee of WFT-Trust or that of a partner organization who observes any improper practice or misconduct on the part of a WFT-Trust member of staff or of a partner organization should report such observations to one of the following:

- a. Executive Director
- b. Director of Finance and Operations
- c. Line Manager

All reports should be properly investigated by a committee set up by the Senior Management Team and a selected external support expert (where relevant). Such experts may include as legal advisor, internal auditor and or Human Resources expert.

The composition of investigation committees should be carefully considered, and allow for possible appeals, and as far as possible, appeals should be handled by the most senior representative of the organization.

Management and Board of Trustees

Where the alleged inappropriate action relates to the conduct of the Executive Director, Members of the Board of Trustees, or Board committee members, the case should be reported to the Chair of the Board of Trustees.

Where the alleged activity that violates WFT-Trust's core values and principles relates to the conduct of the Chair of the Board of Trustee, the case should be reported to the Secretary of the Board of Trustees and the Executive Director.

6. Raising a Concern using the Whistleblowing Mechanism

All WFT-Trust stakeholders are encouraged to raise their concerns following the WFT-Trust Whistleblowing policy within the listed focal points under the policy. However, it is also recognized that the individual may prefer to use an alternative mechanism for reporting an allegation (or, in the case of external parties, may not have access to those mechanisms). Therefore, this policy provides for reporting to this email address whistleblowing@wfttrust.or.tz

WFT-Trust encourages all whistleblowers to provide as much detail about their concern/s as possible, to facilitate a thorough investigation. Provision of the following information is recommended where possible:

- A description of the alleged activity, including dates/times, places, and other informative details that can assist in the investigation;
- Any existing information that supports the allegation (e.g. emails, photographs, copies of messages)
- Date of the disclosure;
- Provide contact details for follow-up by WFT-Trust on the concern raised.

7. Confidentiality

Cases may be reported on a confidential basis or may be reported anonymously using the above stated email address which will be monitored by the Executive Director and Chair of the Board of Trustees.

WFT-Trust encourages both anonymous and open disclosures, however we note that investigations may be more difficult if there is a need to obtain further information in the case of an anonymous report.

While every effort will be made to keep identities confidential, there may be circumstances in which it will be necessary to disclose an identity; this may occur in connection with associated disciplinary or legal investigations or proceedings. Prior to any disclosures of identities, the relevant authority will contact the person who presented the information to inform them of this step.

The safety and security of the whistleblower will be taken seriously at all times, including understanding what other backlash and retaliation they may face.

A whistleblower who is concerned about possible reprisals if their identity is revealed should come forward, after which appropriate measures will be taken to preserve confidentiality. WFT-Trust will always work to ensure a delicate balance between anonymity, where it is needed, and disclosure as it aligns with our values of transparency, accountability, and integrity.

8. Protection and Support for Whistle-blowers

It is understandable that whistleblowers may be concerned about possible repercussions emanating out of the complaints or concerns lodged. Still, WFT- Trust aims to encourage openness and will support staff and others who raise genuine concerns under this policy, whilst also protecting them where needed.

No individual raising genuinely held concerns in good faith under this policy will be dismissed or be subject to any detrimental consequences arising from their actions such as unwarranted disciplinary action, victimization, threats or other unfavorable treatment.

If any person/s is subjected to detriment as a result of making a disclosure, they should inform the Executive Director immediately using the methods and channels as set out in this policy. If the matter concerns the Executive Director, they should then raise the matter of detriment with the Chair of the Board of Trustees. If the matter is not remedied through either channel, they should raise it formally using WFT-Trust Grievance Procedure where applicable.

WFT-Trust staff must not in any way threaten or retaliate against any whistleblowers, be they an internal (fellow staff member) or external party (grantee, donor, supplier, or otherwise). If any member of staff is found to be guilty of such conduct, that staff member will be subject to disciplinary action.

If any WFT-trust staff member is found to have alleged that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. It is important to note that if a case is not upheld that does not always mean that the complaint was false, but rather in some cases that there was insufficient evidence to uphold the allegation or complaint in question.

Support will be offered to whistleblowers as appropriate, regardless of whether a formal response is carried out (e.g. an investigation). This may include specialist psycho-social counselling, medical support, legal support and/or access to other specialist and appropriate support as needed, as determined by the Executive Director and/or Board of Trustees on a case-by-case basis.

Whistleblowers can decide if and when they would like to utilize the support options available to them. In this regard, WFT-Trust is committed to working with grantee partners and stakeholders in ensuring that the support it offers to whistleblowers is appropriately diverse in nature.

9. Handling of reported cases

Disclosures may, depending on the seriousness and nature of the allegations, be referred immediately to the appropriate authorities in the country concerned e.g. the police. Likewise, if urgent action is required (for example to remove a health and safety hazard) such action will be taken before any other investigation is conducted. Risk assessments will subsequently be carried out throughout the process to ensure the safety and wellbeing of everyone involved.

All concerns raised will be responded to. In order to ensure natural justice and prevent malicious allegations, an initial inquiry will be made to decide whether an investigation is appropriate, and if so, what form it should take. Where appropriate, the matters reported may:

- Be investigated by the relevant team set out by this policy;
- Be referred to external enforcement agency or regulator in country;
- Form the subject of an independent (third party) inquiry;
- Be referred to a decision-making panel (that may be set up by WFT-T management with support of the Chair of the Board of Trustees) to review the outcome of the investigation and decide on appropriate corrective action.

Within seven (7) working days of receiving a report the appropriate role/team will

- Acknowledge to the Whistle-blower that the report has been received;
- Where appropriate, indicate in summary form how the relevant investigating authority proposes to deal with the matter;
- Where necessary, give an estimate of how long it will take to provide the next response and or when investigative updates will be provided; or
- If possible, provide an approximate date by which the whistleblower will receive the final communication; or
- Set out why no investigation will take place.

Upon investigation, WFT-Trust Senior Management and or a decision-making panel will take the appropriate corrective action necessary as per the outcome of the investigation.

A whistleblower will also be notified of the outcome of an investigation whenever it is feasible to do so.

10. False Allegations

Any false allegation/s which proves to have been made maliciously or with a view to personal gain will be viewed as a serious disciplinary offence and may result in disciplinary action, including termination of employment or other contract if deemed necessary. False accusation by third parties shall be dealt with in accordance with civil or criminal laws as per set legal procedures or as WFT-Trust may deem fit.

11. Right of Appeal

Persons are entitled to appeal this process or outcome following any decision arising from the assessment stage or investigation stage of the process. Notice of appeal shall be in writing and must be submitted within five (5) working days of the decision to the relevant investigating authority or body.

The Chair of the Board of Trustees or Executive Director may direct another investigation or inquiry pursuant to this procedure and shall decide as to the best means of pursuing the matter further.