



# Whistleblower Protection Policy

*Version 3*

**Approved by: The Board of Trustees**

**Prepared On: September 2023**

**Next Review: September 2025**



## 1. Introduction

The Safa Education Welfare and Charitable Trust (TSEWCT), is committed to maintaining the highest standards of honesty, transparency, and accountability across all departments and activities. This policy aims to provide a clear and confidential process for individuals to report any concerns related to illegal, unethical, or improper conduct. Including fraud, bribery, corruption, money laundering, or any other violation of laws or internal policies. It also ensures that individuals making such reports (whistleblowers) are protected from retaliation, harassment or discrimination from reporting concerns in good faith. TSEWCT recognises that a culture of openness and accountability is essential for the integrity and ethical standards of the organisation. By establishing this policy, we aim to encourage individuals to voice their concerns without fear, ensuring that all reports are taken seriously and investigated thoroughly. As a member of Sphere India - National Coalition Humanitarian Agencies in India, this policy has been created by researching its best practices.

## 2. Policy Statement

TSEWCT encourages employees, volunteers, and stakeholders to come forward with any concerns related to unethical behaviour, financial misconduct, or violations of laws without fear of retaliation. The organisation is committed to ensuring that all whistleblower reports are treated with confidentiality and are fully investigated. Whistleblowers will be safeguarded from harassment, victimisation, or discrimination as a result of reporting their concerns in good faith.

TSEWCT also commits to taking necessary corrective measures based on the findings of any investigation conducted under this policy. While individuals are encouraged to report genuine concerns, deliberately false or malicious reports, may lead to disciplinary action against the individual making such claims.

The policy covers all forms of unethical behaviour or misconduct, including but not limited to:

- Fraud: Intentional misrepresentation or deception for financial or personal gain.
- Bribery and Corruption: Offering, giving, receiving, or soliciting something of value to influence actions.
- Money Laundering (Anti-Money Laundering (AML) Violations): Engaging in transactions intended to conceal the origin of illegally obtained money.
- Misuse of Resources: Diversion or misappropriation of funds, assets, or other resources intended for TSEWCT projects or beneficiaries.
- Data Privacy Violations: Breaches of data protection laws or misuse of personal information.
- Workplace Safety Issues: Violations that compromise the safety or well-being of employees and stakeholders.
- Discrimination and Harassment: Any form of unfair treatment or hostile behaviour based on race, gender, age, or other protected characteristics.



- Other Violations: Any breach of internal policies or applicable laws.

### **3. Definitions**

- Whistleblower: A person who reports suspected or actual illegal or unethical activities within the organization.
- Protected Disclosure: Any communication that discloses information about fraudulent activities, violations of policies, legal breaches, corruption, or unethical behavior.
- Retaliation: Any negative action taken against a whistleblower for making a disclosure, including dismissal, demotion, harassment, discrimination, or any form of punishment.

### **4. Reporting Mechanisms**

- Confidential Reporting: TSEWCT will establish a secure and confidential channel through which any individual can report concerns related to fraud, bribery, corruption, financial misconduct, or violations of AML laws.

Reports can be submitted via:

- A dedicated email address - [vp@tsewct.org](mailto:vp@tsewct.org)
- A whistleblower hotline - 9394419813
- A confidential securely locked drop box located at TSEWCT's office.

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- Anonymous Reporting: Whistleblowers may submit reports anonymously. Anonymous submissions must provide sufficient details to allow for a thorough investigation.

### **5. Whistleblower Protections**

- Confidentiality: The identity of the whistleblower will remain confidential unless disclosure is required by law or necessary for the investigation. In such cases, the whistleblower will be informed prior to the disclosure.
- Protection from Retaliation: Whistleblowers will not face any form of retaliation or harassment for reporting concerns in good faith. Retaliatory actions against whistleblowers are strictly prohibited and will result in disciplinary action, including termination of employment or association with TSEWCT.
- False Reports: While whistleblowers are encouraged to report genuine concerns, knowingly making false or malicious allegations will not be tolerated and may lead to disciplinary measures against the reporting individual.

### **6. Investigation Process**

- Receipt of Report: Upon receiving a report, the relevant authority (the Vice-President) will acknowledge the receipt of the complaint within 7 working days, if the whistleblower is known.
- Preliminary Review: The report will undergo a preliminary review to assess whether the allegations fall within the scope of this policy and require further investigation.



- **Thorough Investigation:** If warranted, an in-depth investigation will be conducted by a neutral, qualified investigator or investigation team. All related departments will be fully informed to cooperate as needed.
- **Report to the Board of Directors:** The findings of the investigation will be documented and presented to the TSEWCT Board, who will determine appropriate actions based on the findings.

## **7. Action and Remedies**

- **Corrective Actions:** If the investigation reveals that fraudulent or unethical conduct has occurred, TSEWCT will take immediate corrective measures, including but not limited to disciplinary actions against individuals involved, termination of contracts, or legal proceedings.
- **Feedback to the Whistleblower:** If the whistleblower's identity is known, they will be informed of the investigation's outcome, while maintaining confidentiality of the process and any disciplinary action taken.

## **8. Responsibilities**

- **Management and Supervisors:** All TSEWCT department heads and managers are responsible for fostering an open, honest, and transparent work environment, encouraging employees to report concerns without fear of retaliation.
- **Training of all the employees and relevant stakeholders on how to report through proper channels and protection to the whistleblower will be provided under policy.**
- **Any concern reported by anyone will be treated with seriousness and ensure the reporting is not biased or made by personal judgments.**
- **Employees and Stakeholders:** All employees, volunteers, and stakeholders are encouraged to report in good faith any unethical, illegal, or concerning activities they witness or suspect.

## **9. Record-Keeping and Confidentiality**

- **Record Maintenance:** All whistleblowing reports, including investigation records, findings, and actions taken, will be securely stored for a period of 7 years
- **Confidentiality:** TSEWCT will maintain confidentiality of all reports and investigations, unless disclosure is required by law or for the purposes of legal proceedings.

## **10. Conclusion**

The Whistleblower Policy ensures a safe and confidential process for reporting misconduct or concerns without fear of retaliation. All stakeholders are encouraged to report concerns in good faith to uphold integrity and accountability.

## **11. Roles and Responsibilities**

- Employees and stakeholders are responsible for reporting suspected misconduct.



## **12. Review and Updates**

This policy will be reviewed as and when needed to ensure its effectiveness and alignment with best practices.