

# WHISTLE BLOWING POLICY

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### **A. Introduction:**

In order to strengthen the organization's adherence to its policies, beliefs, attitudes, and behaviors, MANT has established a whistleblowing policy. The objective of this policy is to offer a reliable process for individuals to voice their concerns when they suspect abuse, major malpractice, or professional misconduct has occurred.

### **B. Policy:**

This policy is applicable to all MANT employees as well as employees of Partner organizations that work with MANT. The policy addresses the obligation to report wrongdoing carried out by MANT employees, partners, and members of the governing body.

Misbehavior, corruption, bribery, and theft are all examples of serious misbehavior. This might comprise, but is not restricted to:

- a. Financial and procedural malpractice, such as mismanagement, theft of funds, fraud that is actual or alleged, or abuse of power.
- b. Falsification of company records by staff, partners, or governing body members for their own gain or the gain of other parties.
- c. Error in the justice system
- d. Any attempt to hide any of the aforementioned

### **C. Reporting Responsibility:**

All MANT employees are obligated to follow this whistle-blowing policy and report any suspected or actual wrongdoing. Employees of Partner organizations must also report any such crimes carried out by MANT personnel or their own personnel in the course of carrying out their Partnership agreements.

### **D. The levels at which the issues will be brought up:**

Any employee or partner who believes they have proof of serious misconduct by a person connected to the organization should bring it to the Management team's attention right away. The Chief Executive, who may contact the Executive Committee, will be alerted to the problem if it cannot be handled at this level. If there has been misconduct on the part of the Program management team or below, it will be brought up before the Management team, and if it is brought up before the Management team, it will be brought up before the Chief Executive, who will then send it to the Executive Committee.

### **E. Reporting Procedure:**

#### **I. Staff**

The staffs may express any issues to their concerned person in the first instance verbally, but subsequently supported in writing, and where possible, with supporting evidence. If this is not feasible due to the involvement of the concerned person the issue needs to be raised with the Director –Administration.

#### **II. Partners**

Partners should first discuss their concerns with their program officer if they believe there has been a case of malpractice. This can be done verbally at first, followed by written documentation that, if possible, includes supporting data. Similar to the above, if a partner believes their programme officer is complicit in such misconduct, they can bring it up with a more senior member of the programme team, such as the Project Director, Chief Executive, Directors, depending on the situation.

#### **III. Volunteers**

In the event of volunteers, a similar process to that described above will be applied; they will bring up the issue with either their supervisor or senior person, depending on the situation.

### **F. Confidentiality:**

Volunteers, Partners, and Staffs who report suspected malpractice or misconduct shall be shielded from victimization and other unfriendly behavior. However, anyone making such an allegation or raising such a worry will follow the proper procedures and provide sufficient evidence to

demonstrate that these concerns have been expressed in good faith. As much as possible, the identity of the person who expresses concerns shall remain private. However, those people who make such disclosures in good faith and without malice or spite will receive this protection. In accordance with the requirement to undertake an adequate inquiry, the secrecy of their reports will be maintained to the greatest extent feasible. This might not always be possible, especially in situations that call for a police investigation or when there is a need for witnesses at a disciplinary hearing.

#### **G. Handling of Reported Cases:**

- The Person, who receives such report, will acknowledge receipt of the report within five working days.
- The Management team should form a committee to thoroughly evaluate all reports. This committee will include at least five members, including the chairperson, a male and female employee, a representative from the community radio station, and a senior employee. When deemed suitable, reported cases may also be forwarded to an outside team for investigation.
- All issues made will be carefully and completely investigated. Any person who has been accused of misbehavior will have the right to fairly and promptly convey their side of the story.
- Following an inquiry, management should take the necessary remedial action that is called for by the findings.
- When it is feasible, the whistle blower would also be informed of the findings of an investigation.
- There may be times when the results of an investigation will be communicated to external entities, such as donors and regulators.
- Whistleblower complaints will be monitored and reported to the Executive Committee once a year.

#### **H. False Allegations:**

Allegations that are not made "in good faith" or that are later proven to be untrue or malicious will be handled as disciplinary offenses, and they will be looked into in accordance with the rules now in place.

#### **I. Prevention of Reporting:**

If some person tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, MANT will take this to be a serious disciplinary misdemeanor or and this instance will be investigated in accordance with extant policies.

#### **J. 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.

#### **K. Notification:**

The Chief Executive, The Director –Administration, The Director-Research, Program Management team, Research team are required to notify and communicate the existence and contents of this policy to the employees of their respective department and all new employees respectively.

The onus of making the Partners aware of their responsibilities vests with Chief Executive who will ensure that programme staff make Partners aware of their responsibility and make them understand that they may report any wrongful conduct of MANT's staff in the execution of a Partnership agreement.