

WHISTLE-BLOWING POLICY

1. Introduction

The Whistle Blowing Policy of Oxfam India aims to reinforce the organization's commitment to its policies, values, attitudes and behaviours. The system provides an alternative channel to other reporting systems to learn of serious problems so that they can be resolved quickly. The purpose of this policy is to provide an effective procedure for people to raise their concerns when they believe that abuse, serious malpractice or professional misconduct has taken place.

2. Policy

- 2.1** This policy applies to all staff of Oxfam India and those of Partner organizations who are in a relationship with Oxfam India. The policy covers the responsibility to report wrongful acts committed by staff of Oxfam India, partners and members of the governing body.
- 2.2** Serious misconduct includes wrong-doing, corruption, bribery or theft. This may include, but is not limited to:
- (i)** Financial and procedural malpractice including those relating to mismanagement; misappropriation of funds; actual or suspected fraud or abuse of authority.
 - (ii)** Falsification of organizational records for personal gain or gain for others on the part of Staff, partners and members of the Governing Body.
 - (iii)** Miscarriage of justice
 - (iv)** Attempting to cover up any of the above

3. Reporting Responsibility

It is obligatory for all of Oxfam India staff to report wrongful acts or suspected wrongful acts in accordance with this Whistle-Blowing policy. Staff of Partner organisations are also required to report such acts committed by Oxfam India staff or their own staff in the execution of their Partnership agreements.

4. Levels at which the concerns will be raised

Any member of the staff or partners believing they have evidence of serious misconduct on the part of any one associated with the organisation should bring the matter immediately to the attention of the Senior Leadership Team (SLT). If the issue cannot be resolved at this level, it will be brought to the attention of the Chief Executive Officer (CEO), who may consult the Chair of the Board of Directors. In case of wrongdoing on part of the ILT and below, it will be placed before the SLT and in case of the SLT; any such instance will be placed before the CEO and in case of CEO it should be sent to Chair of the Board.

5. Procedure for Reporting

5.1 Staff

Staff may raise concerns with their Line Manager, in the first instance verbally, but subsequently supported in writing, and where possible, with supporting evidence. If this is not possible in the event of it concerning the Line Managers, the issue needs to be raised with a more senior Manager.

5.2 Partners

Partners, who are concerned that there has been an instance of malpractice, should initially raise it with their Programme Officer. This can be done initially verbally, but subsequently supported in writing, and where possible, with supporting evidence. Similarly, if the Partner feels that their Programme Officer is a part of such malpractice, they can raise the issue with a more senior person in the Programme team such as the Regional Manager/ Theme Manager, as the case may be.

5.3 Volunteers

A similar procedure, as detailed above will be applicable in the case of volunteers, who will raise the issue with either their Supervisor or Line Manager as the case may be.

6. Confidentiality

6.1 Staff/ Partners/ Volunteers/ who raise concerns of malpractice or misconduct will be accorded protection from victimization, or any other hostile behaviour. However, 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.

6.2 The confidentiality of their 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.

7. Handling of Reported Cases

7.1 The Manager, who receives such report, will acknowledge receipt of the report within **five** working days.

7.2 A Committee set up by the SLT should properly investigate all reports and this will have at least five members, including the Chairperson of the Committee, a woman employee, a male employee, a representative from HR and a representative of the Staff Association. Reported cases may also be passed to an external team for investigation where considered appropriate.

7.3 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.

7.4 Upon investigation, Management should take the appropriate corrective action warranted by the outcome of the investigation.

7.5 The Whistle blower would also be notified of the outcome of an investigation whenever it is possible to do so.

7.6 There may be occasions when external bodies such as donors and regulators will be notified of the outcome of an investigation.

7.7 On an annual basis, issues raised through whistle blowing will be tracked and reported to the Board.

8. 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.

9. Prevention of Reporting

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

10. 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.

11. Notification

11.1 All Managers are required to notify and communicate the existence and contents of this policy to the employees of their department and all new employees respectively.

11.2 The onus of making the Partners aware of their responsibilities vests with Director (Programmes and Advocacy) who will ensure that programme staff make Partners aware of their responsibility and make them understand that they may report any wrongful conduct of Oxfam India staff in the execution of a Partnership agreement.