



Whistleblowing Policy

The purpose of this Policy is to set out safe and effective procedures for the reporting or disclosure of genuine and reasonable concerns about alleged wrongdoing, in order that appropriate remedial action can be taken by the organisation.

This Policy applies to the Self Help Africa Board, all Self Help Africa (and subsidiary company) employees, including affiliate organisations, and to all paid and unpaid consultants, contractors, interns, secondees and volunteers that provide supplies, services or support, to Self Help Africa or promote its work at any location in or out of Ireland. All such parties are referred to as “employee” in this document.

“Self Help Africa Board” is employed as a collective term and refers to the Self Help Africa Ireland Board as well as the boards of Self Help Africa UK, Gorta UK, Partner Africa, Traidlinks, TruTrade and the boards of any entities that may form part of the group in the future.

This Policy also applies to Self Help Africa’s partners, vendors and other third parties, where it is included or referenced in relevant bid or tender documents, agreements, memorandums, purchase orders or contracts.

Version Control

<i>Version No.</i>	<i>Date</i>	<i>By (Name, Position)</i>	<i>Details of changes</i>	<i>Reviewed and approved by (Name, Position)</i>
1	01 / 05 / 2011	Ray Jordan, CEO	N/A	SHA Board
2	24.5.2018	David Dalton, Executive Director	Re draft	SHA Board on 24.5.2018

David Dalton

Executive Director

Peter McDevitt

Chief Finance and Operations Officer

It is the policy of Self Help Africa to conduct our work in an honest open and ethical manner and to take actual or alleged wrongdoing very seriously. Where no obvious impediment exists, such as, but not confined to, conflict(s) or potential conflict(s) of interest, responsibility for pursuing a whistleblowing incident, and for taking any necessary remedial or disciplinary action(s), resides with the Self Help Africa Executive Director. If an impediment exists to the involvement of the Executive Director, responsibility will revert to the Self Help Africa Audit, Finance and Risk Committee. If for any reason the Audit, Finance and Risk Committee is also deemed unsuitable, all aspects and responsibilities will be passed to the Chairperson of the Self Help Africa Board. *Contact details are located at the foot of this policy.

PURPOSE

The purpose of the Self Help Africa Whistleblowing Policy is to give effect to Self Help Africa's duty to protect from abuse its funds, assets, employees, security procedures, policies, and the communities with which and for whom it works. To this end, Self Help Africa encourages all employees to report suspected or actual instances of wrongdoing involving Self Help Africa's operations or the illegal, unethical or inappropriate activities by employee(s). This document sets out Self Help Africa's formal whistleblowing policy, which outlines safe and effective procedures for the reporting or disclosure of genuine and reasonable concerns about alleged wrongdoing, in order that appropriate remedial action can be taken by the organisation.

SCOPE

The Self Help Africa Whistleblowing Policy applies as per the cover sheet. However, external actors cannot be entirely legally bound by Self Help Africa policies. Responses to activities on the part of such actors which may be detrimental to Self Help Africa will ultimately be determined by the terms of contract. Redress may be sought through robust legal action in appropriate cases.

OBJECTIVES

The object of this policy is to provide an effective and safe procedure for people to raise concerns about wrongdoing, suspected wrongdoing, or the likelihood of wrongdoing occurring. Examples of wrongdoing include any deliberate action or inaction which:

- Runs counter to Self Help Africa's governing rules, procedures, policies, or established standards of practice;
- Constitutes a crime or amounts to improper, unethical or unlawful conduct; amounts to a deliberate waste of Self Help Africa resources;
- Constitutes bullying or sexual harassment;
- Puts or significantly risks putting the health and safety of an individual or groups in danger;
- Could reasonably be interpreted as an attempt to conceal or destroy information relating to any of the above.

EXAMPLES OF REPORTABLE WRONGDOING (list not exhaustive):

Illegal or unlawful conduct

Self Help Africa operates in a number of different jurisdictions and its personnel and operations may be subject to international law and foreign national law of host countries, as well as to Irish law. Any act by a Self Help Africa employee or associate that is genuinely believed to be illegal or unlawful may be reported under this policy.

Anti-procedural conduct

Conduct may be considered anti-procedural where it violates Self Help Africa procedures (policies, regulations, rules etc.).

Unethical conduct

Conduct may be considered unethical where the Self Help Africa brand and reputation are put at risk or brought into disrepute.

Deliberately wasteful conduct

The responsible stewardship and use of Self Help Africa's resources is crucial to the success of the organisation's operations. Deliberate wastefulness by personnel will not be tolerated and genuine concerns about such conduct may be reported under this policy.

MAKING A REPORT

Any employee who knows of or suspects wrongdoing should file a report as detailed at the end of this document.

Protection

Any person who, in good faith, makes a genuine and reasonable report of alleged wrongdoing under this policy can be assured that their concerns will be taken seriously and investigated in accordance with this policy and that he or she will not be penalised in any way as a result of making such a report. An employee who threatens or in any way victimises a whistleblower or who seeks to deter a person from raising valid concerns under this policy will be subject to Self Help Africa's disciplinary procedures, up to and including dismissal from employment.

Reporting alleged wrongdoing

It is the responsibility of all Self Help Africa employees to report any suspicions of wrongdoing without delay in accordance with the procedure set out at the end of this document. Great care must be taken in dealing with suspected wrongdoing to avoid:

- Levelling unsubstantiated accusations;
- alerting suspected individuals that an investigation is underway;
- treating employees unfairly.

On no account should any matter relating to a suspicion, active investigation or proven case of wrongdoing be discussed inside or outside Self Help Africa, except at the direction of the Executive Director.

- The whistle-blower should not attempt to confront or interview the person(s) about whom they have suspicions. This is a specialised area and will have implications in any subsequent legal proceedings.
- Nor should they contact the police, as this is a matter for senior managers to report.

Note: External parties (Auditors, consultants, beneficiaries and members of the public) are free to report suspected wrongdoing on the part of a Self Help Africa related individual or organisation.

FEEDBACK

Self Help Africa will be unable to provide any more than very limited feedback to a whistle blower on what action, if any, has been taken on foot of their report under this policy. The sharing of such information could breach the legal rights of a person who is alleged to have committed wrongdoing or compromise the investigation of the case in some way.

UNFOUNDED ALLEGATIONS

If an employee is found to have knowingly lodged a false report(s) against a colleague(s), this will be regarded and treated as a serious disciplinary offence, to be dealt with in accordance with Self Help Africa's disciplinary procedures.

CONFIDENTIALITY AND WHISTLEBLOWING

SELF HELP AFRICA will respect and protect the confidentiality of a whistle-blower provided however that his/her identity and the allegations made will be shared with the persons investigating the alleged wrongdoing and, where relevant, the Audit, Finance and Risk Committee. In addition, Self Help Africa may be required to reveal the identity or provide information that would indicate the identity of a whistle-blower if the matter is referred to local law enforcement or if so legally required. Confidentiality can only be effective if a whistle-blower does not make his or her identity known to a third party.

ANONYMOUS WHISTLEBLOWING

A whistle-blower may choose to communicate his or her concerns to Self Help Africa anonymously: For example, in an unsigned letter. Self Help Africa respect the choice of anyone who wishes to remain anonymous. However, allegations are often more difficult to investigate when a complainant remains anonymous, and the outcome of an investigation can be affected.

PROCEDURES FOR INVESTIGATING POSSIBLE WRONGDOING

Self Help Africa is committed to investigating and addressing all reported cases of alleged wrongdoing thoroughly and with due process. The Executive Director will oversee Self Help Africa's response to any allegations of wrongdoing. It is the responsibility of the Executive Director to inform the Board and the Audit, Finance and Risk Committee of incidences of reported wrongdoing, and to provide status reports where investigations are ongoing. Procedures on the investigation process are outlined in the Anti-Fraud Policy.

NOTIFICATION OF THIRD PARTIES

The Executive Director will, where appropriate, report to interested third parties (such as donors and regulatory bodies) on a confirmed fraud and indicate what steps have been taken to address any identified weaknesses in Self Help Africa's systems of internal control. Any decision to refer incidences of fraud to local law enforcement agencies will be taken by the Executive Director having considered the local context and the consequences in human rights terms of initiating criminal prosecution against the individual involved.

DISCIPLINARY PROCEDURES & REFERENCES

Any employee who is suspected of or found to have committed wrongdoing will be subject to Self Help Africa's disciplinary procedures, up to and including dismissal from employment. Self Help Africa may also initiate legal proceedings to recover loss suffered by it as a result of the wrongdoing from any such employee. Where a reference is requested for a member of employees who has been disciplined or prosecuted for wrongdoing, the Head of Human Resources shall prepare a response in line with Self Help Africa's policies and employment law.

TO MAKE A REPORT

If you are concerned about theft, fraud or other wrongdoing in your workplace please use the options below:

Internally to Self Help Africa: confidential.reporting@selfhelpafrica.org

Externally: the contact information below to make a report in strictest confidence to Expolink.

- Phone UK: 0800 374 199
- Phone International: +44 1249 661808 (reverse charges available via international operator)

- E-mail: selfhelpafrica@expolink.co.uk
- Web: <https://wrs.expolink.co.uk/selfhelpafrica>

Expolink is a completely independent company. Your conversation will not be recorded. You can choose to remain completely anonymous, with only details concerning your report being passed back to your employer.

APPENDIX 1 DONOR CONTACT INFORMATION

Self Help Africa encourages all employees to report suspected or actual instances of wrongdoing involving Self Help Africa's operations or the illegal, unethical or inappropriate activities by employee(s) internally through the channels detailed in the Whistleblowing Policy 2018. The Executive Director will, where appropriate, report to interested third parties (such as donors and regulatory bodies). Self Help Africa also aims to maintain, and make generally available to our employees, an up-to-date list and contact details of the various external agencies to whom it is possible to make a disclosure. Self Help Africa will also share relevant matters that may be reported to them.

These external parties include, but are not limited to, Self Help Africa's donors

1. Irish Aid, IAPF: Portfolio Manager xxx.xxx@dfa.ie
2. DFID: fraud@dfid.gov.uk
3. UNHCR: inspector@unhcr.org; through the website: www.unhcr.org/php/complaints.php
4. United Nations: Office of Internal Oversight Services: <https://oios.un.org/page?slug=Contact-US>
5. ECHO: echo-reportfraud@ec.europa.eu
6. European Anti-Fraud Office: <https://fns.olaf.europa.eu/>
7. OIG (Office of the Inspector General US government): <https://oig.state.gov/hotline-form>

For employees in Ireland or the UK disclosures can also be made to:

Republic of Ireland

The Charities Regulatory Authority Ireland: Email: concerns@charitiesregulator.ie Tel: 01 633 1550
Concerns About Charities, The Charities Regulator, Waterloo Exchange, Waterloo Road, Dublin 4,

United Kingdom

Charity Commission Tel: 0300 066 9197 Email: whistleblowing@charitycommission.gsi.gov.uk
www.charitycommission.gov.uk
(<https://www.gov.uk/guidance/whistleblowing-guidance-for-charity-employees>)

Most of these organisations have their own reporting format, but the below gives an idea of the information you will need to provide (please remember to keep a copy of all your correspondence):

- Give a detailed description of the suspected wrongdoing, including date(s) and location;
- If possible, provide copies of information that tend to support your suspicions;
- Include any information relating to your raising (or not raising) the concern under SHA's internal procedure;
- Date the disclosure;
- Give your preferred contact details;
- Make it clear that either (i) you expect confidentiality or (ii) you want your name associated with the disclosure.