ICVA POLICY FOR
WHISTLEBLOWING

1. Purpose

We are committed to conducting our work in accordance with “ICVA's organisational Safeguarding Policies and Comprehensive Code of Conduct”\(^2\). However, all organisations face the risk of things going wrong or of unknowingly harbouring illegal or unethical conduct. A culture of transparency and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

2. Objectives

ICVA’s policy for whistleblowing aims to:
1. Encourage and enable Whistleblowers to report suspected wrongdoing within ICVA as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality and, if desired, anonymity will be respected;
2. Provide Whistleblowers with a safe, effective and accessible procedure for how to raise Whistleblowing concerns; and
3. Reassure Whistleblowers that they should be able to raise genuine concerns regarding the conduct described below without fear of retaliation or reprisals, even if they turn out to be mistaken. Though maliciously false reporting will not be accepted.

\(^1\) The Whistleblowing Policy will be integrated in the next version of the “ICVA organisational Safeguarding Policies and Comprehensive Code of Conduct” which will include sections beyond matters relating to Sexual Exploitation, Abuse and Harassment”. The Whistleblowing Policy is in coherence with sections 6. Principles to Handle Complaints & Reports, 7. Principles to Investigate Complaint and 8. Principles for Victim Assistance.

3. Application and scope

1. This Whistleblowing Policy applies to all “ICVA Staff” and “ICVA Associates”³.
2. Nothing contained herein is intended to provide any Protected Person with any additional rights or causes of action, other than those provided by law. We further reserve the right to amend this policy at any time.
3. This Whistleblowing Policy is not designed to allow “ICVA Staff” and “ICVA Associates” to express concerns about their individual terms and conditions of work. “ICVA Staff” and “ICVA Associates” are encouraged to use ICVA’s Complaint Mechanisms in order that such concerns may be resolved and redressed.
4. This Whistleblowing Policy should be read in conjunction with local legislation (where possible).
5. This policy supersedes all prior policies, guidelines and practices that pertain to Whistleblowing.

4. Roles and responsibilities

1. All “ICVA Staff” and “ICVA Associates” shall be responsible for:
   a. Reporting any Whistleblowing concerns they may have in accordance with the reporting procedure described below, as ICVA may amend in its discretion.
   b. Assist in any investigations of Whistleblowing concerns by making available all relevant information and by cooperating in interviews.
2. Managers are responsible for:
   a. Ensuring that the principles of this policy are communicated and understood throughout their teams.
   b. Escalating any reports of Whistleblowing concerns they may receive as per section 5 of “Principles to Handle Complaints & Reports” of «ICVA’s organisational Safeguarding Policies and Comprehensive Code of Conduct”.
3. The Director of Finance and Administration shall be responsible for:
   a. Providing training, advice, guidance and ongoing support to Staff on the implementation and use of the Whistleblowing Policy;
   b. Determining the scope of investigation of Whistleblowing concerns raised pursuant to this policy, and ensuring that any subsequent investigation is promptly and properly managed;
   c. Facilitating the implementation of appropriate responses to recommendations made in Whistleblowing investigation reports;
   d. Advising, the Finance and Admin Committee of the Board of all reported Whistleblowing concerns;
   e. The retention of all records of reported Whistleblowing concerns and Whistleblowing investigations on a strictly confidential basis for the required periods.
4. The Director is responsible for ensuring the implementation and monitoring of the Whistleblowing Policy.
5. The Board of ICVA is responsible for overseeing management’s implementation and monitoring of the Whistleblowing Policy.

³ ICVA’s organisational Safeguarding Policies and Comprehensive Code of Conduct applies to ICVA secretariat staff (“ICVA Staff”) as well as to ICVA board members, ICVA interns, contractors or other parties (“ICVA Associates”), who, under an ICVA mandate undertake field trips to locations, where they come in contact with persons of concern to ICVA member and partner organisations (“persons of concern”) or otherwise assist ICVA in organising events and conferences at national, regional and international level.
5. Process

Raising a Whistleblowing concern:

a. “ICVA Staff” and “ICVA Associates” should be encouraged to report Whistleblowing concerns to their line manager, a more senior manager up to and including Director, or a senior representative of their choice. Reports may be made in person, by telephone or in writing.

b. Third parties and ICVA members
   Third parties can report any suspected irregularities or wrongdoing by ICVA by raising their concern with a member of “ICVA Staff” or “ICVA Associates”.

c. External disclosures
   This Policy aims to provide an internal mechanism for reporting, investigating andremedying Whistleblowing concerns. This does not, however, affect the right of “ICVA Staff” and “ICVA Associates” to report Whistleblowing concerns to an external body (such as a regulator) where the individual believes this is the appropriate course of action. We would encourage Whistleblowers to seek advice from a Manager before reporting Whistleblowing concerns externally.

An on-line report form is suggested on-line for internal and external reporting and communication on alleged misconduct.

6. Confidentiality

Whistleblowers should feel comfortable reporting Whistleblowing concerns openly under this Policy. Reports of Whistleblowing concerns will be treated with the utmost confidentiality by all parties involved or otherwise aware of what has been reported, subject to any disclosures required as part of any regulatory process or legal proceedings.

Although not prevented from doing so, Whistleblowers are encouraged not to make anonymous disclosures since proper investigation may be obstructed if investigators cannot clarify or obtain further information from the Whistleblower. Whistleblowers who are concerned about possible retaliation or reprisals if their identity is revealed should make this clear when making the report so that appropriate measures can be taken to protect their identity as far as possible.

7. Investigating Whistleblowing concerns

The ICVA Executive Director is the “Policy Administrator”. He/she shall determine who is appropriate to manage reports of Whistleblowing concerns. The Policy Administrator may delegate the responsibility to investigate a reported Whistleblowing concern to one or more appropriate members of Staff or to any other individual, including persons not employed by ICVA. ICVA will make use, where possible, of the investigation capacity of ICVA members.

Whistleblowers may request to be accompanied at any meetings in respect of the Whistleblowing concern by a colleague of the Whistleblower’s selection. The Whistleblower may be requested to select an alternative colleague if the one identified is deemed not to be a reasonable choice.
Where appropriate and subject to the need for confidentiality, the Whistleblower should be kept informed of the progress of the investigation.

If an investigation concludes that a Whistleblower has maliciously or knowingly made false allegations, the Whistleblower may be subject to disciplinary action, up to and including termination of employment.

8. Protection and support for Whistleblowers

ICVA is committed to protecting members of “ICVA Staff” and “ICVA Associates” who make disclosures under this Policy.

Any member of “ICVA Staff” and “ICVA Associates” who retaliates against a Whistleblower or in any way causes a Whistleblower to suffer adverse employment consequences as a result of their report is subject to discipline up to and including termination of employment. Retaliation and adverse employment consequences may include, for example, intimidation, bullying, harassment and discrimination, failure to promote, adverse impact on compensation or benefits, termination, suspension, demotion, or other change in responsibilities whether formal or informal. “ICVA Staff” and “ICVA Associates” who believe they have suffered retaliation or adverse employment consequences as a result of having reported a Whistleblowing concern should inform the Policy Administrator.