



# **Whistleblowing Policy and Procedure BRAC International**

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## **1. Introduction**

An Organisation needs to maintain various channels of reporting, to ensure employees and operations are functioning as per law, its own values and policies and regulations. BRAC is committed to upholding a safe, legal, and policy complaint workplace, for all its employees and program participants. BRAC strives for integrity, which means it creates a transparent and accountable work environment, where people feel safe when, reporting potential, or witnessed, or experienced breaches of values, policies, standards and procedures to the Organization.

BRAC, for over forty years, has given paramount importance to the safety of the participants of its programs, the safety of the employees of its programs, and the safety of the employees of its enterprises, in the way it has conducted its (anti-poverty) work.

The whistleblowing policy goes beyond safeguarding- it is about all policies dealing with financial integrity, anti-corruption, and as well as physical safety within BRAC programs.

Specifically to safeguarding, BRAC has safeguarded its people (program participants, employees) in the first place, by making their safety a primary consideration already, at the level of the design of programs and enterprises. The prevention of sexual harassment, intimidation, violence, bullying, humiliation and discrimination, neglect and exploitation, is as far as possible, built into the work practices by itself. If the design and its implementation cannot reduce risks sufficiently, BRAC has installed secondary safeguarding mechanisms, like selecting and training of personnel, supervising and monitoring activities, reporting channels, investigations and punishments.

Reporting of malpractice and integrity breaches of any type has many channels in the normal work organization. This whistleblowing policy is the safety valve, to ensure that breaches of any kind, not only can, but also will be reported, anonymously if necessary.

In the overall safeguarding policy, BRAC has described its history in more than forty years of safeguarding practice. BRAC pledges to continue its vigilance. The safeguarding policy also describes BRAC's ethos and prevention practice in general.

## **2. Scope**

This policy should be read and interpreted in line with the overarching Safeguarding Policy. The aim of this policy is to enable employees to report unethical or any other behavior that potentially breaches BRAC's standards, code of conduct and policies on the basis of anonymity and protection. The policy applies to all employees including regular, contractual, project, service, trainee (including apprentices & interns), volunteers, temporary staffs and non-graded staffs and programme participants of BRAC.

Any behavior contrary to BRAC's policies and Code of Conduct can be reported under this policy.

The following is a non-exhaustive list of incidents involving BRAC staff or programme participants that can be reported:

- abuse
- sexual harassment
- intimidation
- violence
- bullying
- humiliation
- neglect
- exploitation
- discrimination
- damage to BRAC's assets or property
- Incidents that maybe damaging to BRAC's reputation.

### **3. Definitions**

#### **Whistleblowing**

Bringing to the organization's attention activities that may potentially be illegal, unethical or in breach of BRAC's policies, standards, code of conduct and regulations.

#### **Reprisal**

An act of retaliation as a result of a complaint. For example: the threat of losing one's job or employment related benefit because the person made a complaint.

#### **Anonymity**

The identity and other personal details of the complainant remaining confidential and anonymous.

### **4. Prevention**

One of main priorities of BRAC is to prevent harassment and uphold a safe working environment. The preventive measures will be:

- Orientation about current Safeguarding and the sub-set of policies during every employees onboarding
- Refresher training for all employees after certain intervals on safeguarding and sub-set policies.
- Circulate/display a short version of policy procedures at all locations within BRAC establishment
- Circulate leaflet/Poster/Booklet and include the messages in the staff dairy and client's passbook.

## 5. Reporting

Complaints or allegations can be made directly to the Safeguarding Focal Point, Head of HRD or Country Representative. The contact phone number and e-mail addresses of all these contact persons are available in all BRAC offices.

Complaints can be lodged to [bi.safeguarding@brac.net](mailto:bi.safeguarding@brac.net), [voice.international@brac.net](mailto:voice.international@brac.net) or [voice.countryname@brac.net](mailto:voice.countryname@brac.net) (i.e for Uganda- [voice.uganda@brac.net](mailto:voice.uganda@brac.net), for Afghanistan – [voice.afghansitan@brac.net](mailto:voice.afghansitan@brac.net))

## 5. Protection of Whistleblower

No action will be taken against the staff person or anyone else for making a report through this channel or for cooperating with the investigators. Disciplinary proceedings may be initiated against any staff member who is proved to have retaliated against a whistleblower or persons assisting by providing evidence to investigators. All reasonable steps will be taken by BRAC personnel to maintain the highest level of confidentiality. Should the situation arise where the issue cannot be properly investigated and/or resolved without disclosing the individual's identity then the responsible designated officer handling the complaint will inform the whistleblower and will discuss whether and how the investigation may proceed. Any unwarranted breach of confidentiality under this circumstance may give rise to disciplinary action. If the whistleblower complains of the retaliation the complaint follow the same process as any other complaint management process. The flow chart of complaint management mechanism is attached as annexure-1.

### Human Resource Compliance Committee (HRCC):

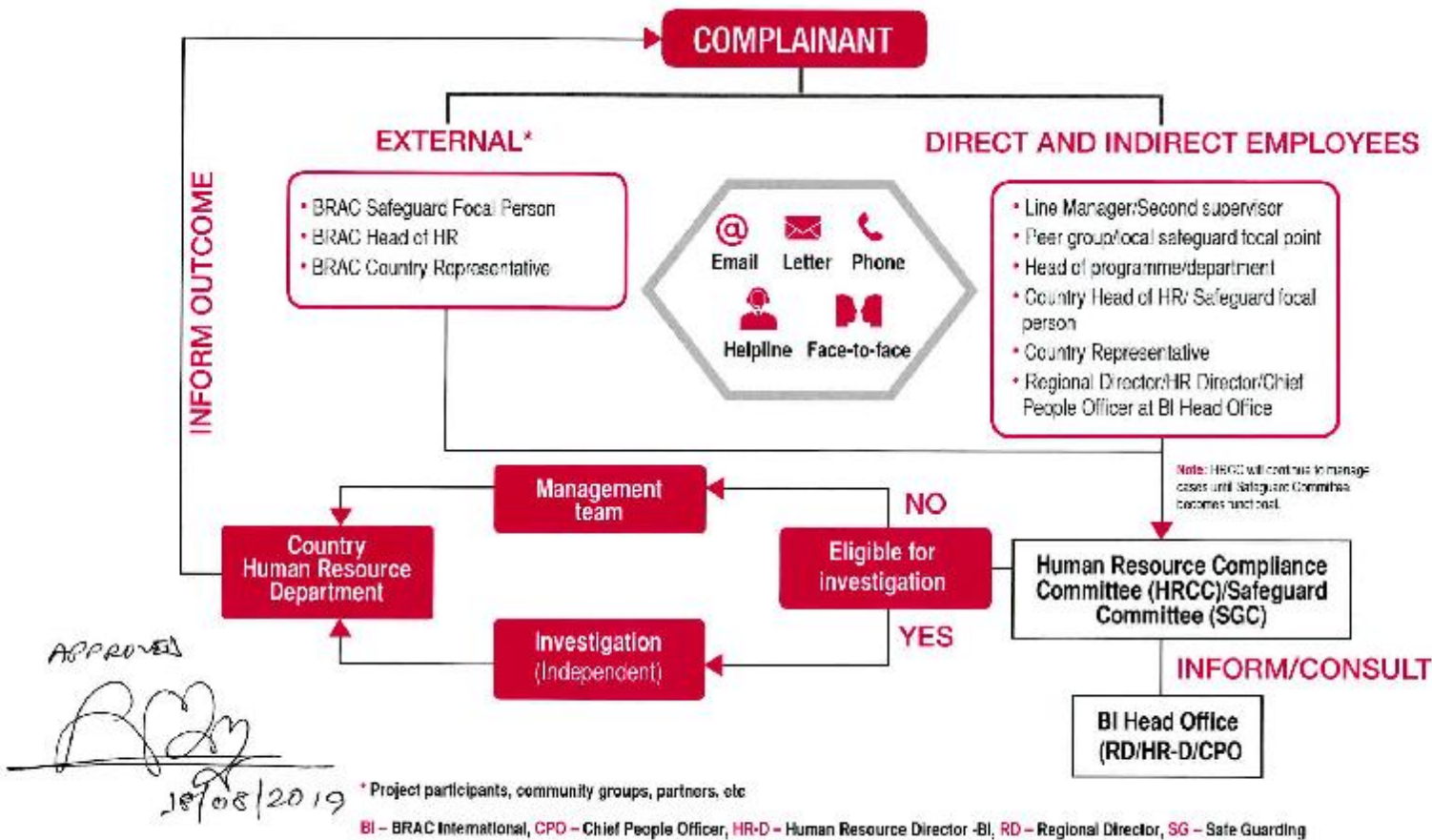
The Human Resource Compliance Committee of BI Countries ensures that all complaints, including whistleblowing is received, registered and responded in appropriate manner as per complaint management guideline. If the complaint is made through the helpline the HRCC will convene meeting and decide way forward to inquire and reveal the facts and also provide safety measures for the victim, if necessary. If required, the HRCC will form an investigation team and give a timeframe to complete the investigation. The HRCC will review the investigation report and take decisions on action based on the findings of the investigation. Accordingly, the HRD will execute the actions and inform the complainant about conclusion of the case. A flow-chart on the complaint mechanism is attached as Annex-1.

**Special Note:** The whole process will not take more than 60 days after a complaint has been lodged.

## **7. Review of Policy and Procedure**

The policy will be reviewed at a minimum of every 3 years or when it is shown necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to legislation.

## SAFEGUARD REPORTING AND RESPONDING MECHANISM FOR BRAC INTERNATIONAL COUNTRIES



Annexure - 1