

## **WHISTLEBLOWER POLICY (EWDO)**

### **Introduction**

Ekwendeni Women Development Organization (EWDO) exists to empower women, girls, and communities through programs that promote equality, dignity, and sustainable livelihoods. In fulfilling this mission, EWDO commits itself to principles of transparency, accountability, and ethical governance.

To safeguard these values, EWDO has established this Whistleblower Policy, which provides a framework for reporting concerns about misconduct, wrongdoing, or unethical behavior within the organization. The policy ensures that concerns are taken seriously, investigated appropriately, and that whistleblowers are protected from retaliation.

### **Purpose of the Policy**

The primary purposes of this policy are to:

- Encourage and enable staff, volunteers, partners, and external stakeholders to raise concerns about suspected misconduct at the earliest opportunity.
- Establish clear mechanisms for confidential and secure reporting.
- Ensure allegations are handled promptly, fairly, and transparently.
- Protect whistleblowers from retaliation, victimization, or adverse consequences.
- Uphold EWDO's commitment to good governance, donor confidence, and public trust.
- Ensure compliance with applicable laws, donor regulations, and international best practices for non-profit governance.

### **Guiding Principles**

This policy is founded on the following principles:

- **Integrity:** EWDO commits to conducting its affairs honestly and ethically.
- **Accountability:** All individuals associated with EWDO are answerable for their actions.
- **Transparency:** Concerns will be investigated objectively and fairly.

- **Confidentiality:** Whistleblower identities and reports will be safeguarded.
- **Protection:** No individual will suffer retaliation for raising concerns in good faith.
- **Zero Tolerance:** EWDO will not tolerate fraud, corruption, abuse, or exploitation.

## **Scope of Application**

This policy applies to:

- EWDO staff (permanent, temporary, interns, and volunteers).
- EWDO Board members.
- Contractors, consultants, and suppliers.
- Donors, grantees, and implementing partners.
- Beneficiaries and members of the public interacting with EWDO

## **Definition of Whistleblowing**

**Whistleblowing** is the deliberate act of reporting suspected or actual misconduct within or associated with EWDO.

**Misconduct** includes, but is not limited to:

- Fraud, theft, bribery, and corruption.
- Abuse, exploitation, or neglect of beneficiaries (especially children and women).
- Harassment, discrimination, or sexual misconduct.
- Breaches of EWDO's Code of Conduct, safeguarding, or financial/procurement policies.
- Conflict of interest or abuse of authority.
- Misuse of donor funds or organizational resources.
- Health, safety, or environmental violations.
- Attempts to cover up any of the above.

## **Reporting Channels**

Whistleblowers may choose to report concerns openly, confidentially, or anonymously. Reports should be made through any of the following channels:

1. Immediate Supervisor or Project Manager.
2. Executive Director (if the concern does not involve them).
3. Whistleblower Email: [info@ewdomw.org](mailto:info@ewdomw.org)
4. Dedicated Hotline: (+265 884 736 812).
5. Postal Mail: Confidential, addressed to “The Whistleblower Desk, EWDO Board Chairperson.”
6. Board Chairperson (if the concern involves senior management, including the Executive Director).

Where appropriate, EWDO may also establish an independent external whistleblower mechanism managed by a third party to ensure neutrality.

### **Investigation Process**

Receipt of Report	<ul style="list-style-type: none"><li>• All reports received through designated channels will be acknowledged within <b>5 working days</b>.</li><li>• The Executive Director (or Board Chairperson, if applicable) will log the complaint in the <b>Whistleblower Register</b>.</li></ul>
Preliminary Review	<ul style="list-style-type: none"><li>• The Executive Director or Audit &amp; Risk Committee conducts an initial assessment to determine:<ul style="list-style-type: none"><li>○ Credibility of the allegation.</li><li>○ Applicable policies or laws breached.</li><li>○ Whether an investigation is warranted.</li></ul></li></ul>
Investigation	<ul style="list-style-type: none"><li>• Investigations must commence within <b>10 working days</b> of receipt.</li><li>• Depending on the nature of the case, investigations may be conducted by:<ul style="list-style-type: none"><li>○ Internal audit team.</li><li>○ A specially designated investigation committee.</li></ul></li></ul>

	<ul style="list-style-type: none"> <li>○ External, independent investigators.</li> <li>○ Referral to legal or law enforcement authorities (if criminal in nature).</li> </ul>
Conclusion	<ul style="list-style-type: none"> <li>● Investigations must conclude within <b>30 calendar days</b>, unless extended with Board approval.</li> <li>● Findings will be documented in a written <b>Investigation Report</b>.</li> <li>● The report will outline: facts established, evidence considered, conclusions, and recommended actions.</li> </ul>
Decision and Action	<ul style="list-style-type: none"> <li>● The Board Audit &amp; Risk Committee (or Board Chairperson if sensitive) will review findings and determine action.</li> <li>● Actions may include disciplinary measures, termination, referral to authorities, or organizational reforms.</li> </ul>

### **Feedback to Whistleblowers**

- Whistleblowers will be informed, as appropriate, of the progress and outcome of their report, subject to legal and confidentiality constraints.
- EWDO commits to transparent communication without compromising sensitive information.

### **Protection from Retaliation**

- No whistleblower who reports in good faith shall suffer retaliation, harassment, discrimination, or adverse employment consequences.
- Any act of retaliation will be treated as a serious violation and may result in dismissal or contract termination.
- Whistleblowers who feel they are being victimized should immediately report to the Executive Director or Board Chairperson.

### **False or Malicious Allegations**

- Reports made in good faith are protected, even if investigations do not substantiate the claims.
- However, deliberately false, malicious, or frivolous allegations will be treated as misconduct and may lead to disciplinary action.

### **Roles and Responsibilities**

<b>Entity</b>	<b>Responsibilities</b>
<b>Board of Directors</b>	Approves policy, ensures oversight, and receives high-level reports.
<b>Board Audit &amp; Risk Committee</b>	Oversees investigations, ensures independence, and approves outcomes.
<b>Executive Director</b>	Implements the policy, ensures awareness, receives reports, and commissions investigations.
<b>Supervisors/Managers</b>	Encourage reporting, act promptly on complaints, and protect whistleblowers.
<b>Internal Audit/Investigators</b>	Conduct fair, timely, and professional investigations.
<b>All Staff and Stakeholders</b>	Report concerns honestly, cooperate with investigations, respect confidentiality.

### **Training and Awareness**

- EWDO will conduct annual **staff training** on whistleblower rights and reporting procedures.
- Awareness sessions will be extended to volunteers, partners, and beneficiaries where relevant.
- This policy will be published on the EWDO website and made available in both English and local languages.

### **Monitoring and Review**

- The Executive Director will maintain a **Whistleblower Register** documenting all reports, actions, and resolutions.
- The Board Audit & Risk Committee will conduct an **annual review** of whistleblower reports and outcomes.
- The policy will be reviewed every **two years**, or earlier if legal or operational changes require.

### **Confidentiality**

- All whistleblower reports will be treated as confidential to the maximum extent possible.
- Information will only be disclosed on a need-to-know basis for investigation and resolution.
- If disclosure of the whistleblower's identity is unavoidable, EWDO will first seek consent and explain the risks involved

### **Policy Approval and Effective Date**

This Whistleblower Policy has been reviewed and approved by the **EWDO Board of Directors** and takes effect from **3<sup>rd</sup> March, 2025**.

