

HOPE SPRING FOR ALL NATIONS WHISTLEBLOWING POLICY



HSFAN

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SOUTH-WEST REGION 1/08/2022

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1. POLICY STATEMENT

Hope Spring for All Nations (HSFAN) is committed to maintaining the highest standards of integrity honesty, morality, accountability, lawfulness and transparency. This Whistleblowing Policy provides a mechanism for staff, volunteers, and other stakeholders to report concerns about unethical or illegal activities without fear of retaliation.

These include s. HSFAN continuously works to protect the vulnerable populations it serves as well as the broader public, partners, donors, employees, consultants, interns and volunteers in accordance with its whistle- blower policy. HSFAN requires all its members and staff, including national and international volunteers, as well as interns to observe high standards of personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

2. SCOPE AND APPLICATION OF THE POLICY

This policy is meant to address public interest issues that may at least be investigated individually but may ultimately necessitate the use of other processes including legal actions. These issues might consist of;

- Criminal Offense
- Any act of corruption
- Failure to comply with any legal obligation
- A miscarriage of justice
- Danger of health and safety of any individual
- Sexual harassment
- Retaliation against whistle blowers.
- A safeguarding child prevention violation
- A threat to the operation and reputation of HSFAN
- Improper conduct or unethical behavior,
- Any attempt to conceal any of these

3. Purpose

The purpose of this policy is to encourage the reporting of serious concerns, including but not limited to, misconduct, illegal activities, and violations of HSFAN's policies. It ensures that such concerns are investigated thoroughly and that individuals who report them are protected.

The purpose of this policy is to:

- Encourage the reporting of serious concerns, including misconduct, illegal activities, and violations of HSFAN's policies.
- Establish a structure where employees may voice concerns about malpractice in a supportive environment.
- Provide a clear mechanism for reporting and investigating these concerns.
- Protect individuals who report concerns from retaliation.
- Provide avenue to raise these concerns.
- Reassure staff that they will be protected when these concerns are raised.

4. Reporting mechanism

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that HSFAN can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of HSFAN's code of ethics or suspected violations of procedures that govern HSFAN's operations.

Concerns can be reported through:

- Directly to a Executive Director: Individuals are encouraged to report concerns to their immediate Program manager in a confidential manner.
- Whistleblower Hotline: Use the designated whistleblower hotline, available at [+971569515525] or through the online portal at [www.hsfan.org], to report concerns anonymously.

- Dedicated Email Address: Send a confidential email to [\[janet@hsfan.org\]](mailto:janet@hsfan.org)(mailto:maurice@hsfan.org). Emails should be detailed, including the nature of the concern, involved parties, and any supporting documentation.

5. Confidentiality

Reports will be handled with the highest level of confidentiality. The identity of the whistleblower will be protected to the extent possible, and information will be disclosed only to those directly involved in the investigation and resolution process.

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. HSFAN will handle any such disclosures with discretion and respect. If it doesn't obstruct or jeopardize any investigations, the identity of the person making the complaint may be kept a secret. The source of the information, however, might come to light during the inquiry process, and the person making the disclosure might be forced to provide a statement as part of the necessary evidence.

1. ANONYMOUS ALLEGATIONS

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the organization. In exercising this discretion, the factors to be considered will include:

- The seriousness of the issues raised.
- The credibility of the concern.
- The likelihood of confirming the allegation from attributable sources.

UNTRUE ALLEGATIONS

No action will be taken against a person who makes an honest allegation that is not supported by a subsequent investigation. The person making the disclosure should take reasonable precautions to ensure the accuracy of the information. However, disciplinary action may be taken against a person if they continue to make malicious or vexatious accusations, if they do so repeatedly.

6. Protection Against Retaliation

GOOD FAITH

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

This policy is designed to offer protection to those employees of HSFAN who disclose such concerns provided the disclosure is made:

- in good faith
- The individual making the disclosure reasonably believes that it tends to show malpractice or impropriety, and if they make the disclosure to the appropriate person.

HSFAN is committed to ensuring that no retaliation occurs against individuals who report concerns in good faith. Retaliation includes, but is not limited to, harassment, discrimination, or adverse employment actions. Individuals who believe they are experiencing retaliation should report it immediately through the same channels described above.

NO RETALIATION

It is contrary to the values of Hope Spring For All Nations for anyone to retaliate against any board member, officer, employee, volunteer or intern who in good faith reports an ethics violation, or a suspected violation of procedure, such as a complaint of discrimination, or suspected fraud, or suspected violation of any procedures governing the operations of the organization. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including suspensions and /or termination of employment

7. Investigation

- Procedure: All reports will be investigated promptly and thoroughly. Investigations will be conducted by a designated investigation team or an external investigator, as appropriate, based on the nature and severity of the concern.
- Documentation: Findings will be documented comprehensively, including the investigation process, evidence gathered, and conclusions reached.
- Timeliness: The investigation will be conducted in a timely manner, with regular updates provided to the whistleblower, subject to confidentiality constraints.

These aspects should be taken into consideration:

- Full details and clarifications of the complaint should be obtained.
- The Executive Director shall take lead of the investigation of all reports made that do not include any misconduct involving her/him. Where misconduct involves any of the board members, the CEO or ED with investigate with other Board Members.
- The investigation lead should inform the member of staff against whom the complaint is made as soon as is practically possible.
- The allegations should be fully investigated by the investigation lead with the assistance, where appropriate, of other individuals.

- A judgement concerning the complaint and validity of the complaint will be made by the investigation lead. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be sent to the Chief Executive Officer or other members of Board of Director as the case may be.
- The Chief Executive Officer or Executive Director as the case may will decide what action to take. If the complaint is shown to be justified, then disciplinary action shall be taken.
- The whistle-blower should be kept informed of the progress of the investigations and, if appropriate, of the outcome

8. Resolution and Follow-Up

- Corrective Actions: Based on the investigation findings, HSFAN will take appropriate corrective actions, which may include disciplinary measures, policy changes, or legal action.
- Communication: The whistleblower will be informed of the outcome of the investigation, unless confidentiality constraints prevent disclosure.

9. Training and Awareness

HSFAN will provide training to all employees, volunteers, and other relevant parties on this Whistleblowing Policy. Training will cover how to report concerns, protections for whistleblowers, and the investigation process. Regular reminders and updates will be communicated to ensure ongoing awareness.

10. Policy Review

This policy will be reviewed annually and updated as necessary to reflect changes in legal requirements, organizational practices, or operational needs. Amendments will be communicated to all stakeholders.

11. WHO TO REPORT TO?

- Reach Out employees, consultants, interns, and volunteers should raise a suspected misconduct in the first instance to their Head of Departments. Partners should raise suspected misconduct to the Chief Executive Officer by email at janet@hsfan.org or by phone at +971567064561.
- Once a Reach Out employee has received a report of suspected misconduct, they must escalate the issue to the Chief Finance Office maurice@hsfan.org or Tel: +971569515525, the Programs Officer (email: leolin.hsfan@gmail.com or Tel: +237 679985472).

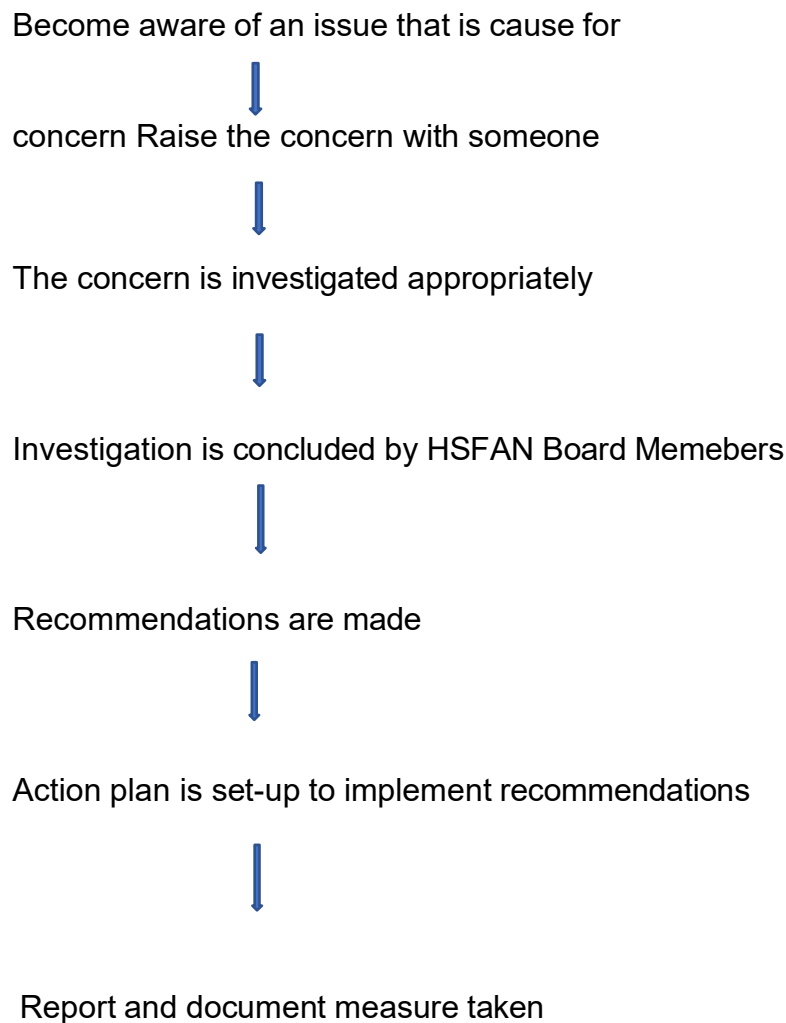
12. HOW TO MAKE A REPORT

- Reports may be made verbally, through emails or hard copies or other reporting channels made available to staff, including the suggestion boxes.
- Individuals submitting reports of suspected misconduct should include all pertinent information with regards to the suspected misconduct including any

documentary or other evidence. While reports of suspected misconduct may be submitted anonymously, including the name of the individual making the allegation may add to the credibility of the allegation and may facilitate a more effective investigation.

- The HSFAN suggestion box can be used to report instances of corruption and bribery, sexual harassment, sexual abuse, and/or sexual exploitation.

WHISTLE-BLOWING PROCESS FLOW CHART



CEO



This policy is effective as of 05-01-2024

HOPE SPRING FOR ALL NATIONS

info@hsfan.org

Acknowledgement of Receipt and Understanding

I acknowledge that I have received and read Hope Spring for All Nations' Whistleblowing Policy. I understand the procedures for reporting concerns and the protections afforded to whistleblowers under this policy.

Name: _____

Position: _____

Signature: _____

Date: _____