



WHISTLE BLOWING POLICY AND PROCEDURE

15.1 POLICY DEFINITION

FAWE Liberia is committed to the highest standards of openness, integrity, and accountability. An important aspect of accountability and transparency is a mechanism to enable staff and other members of FAWE to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve their employer and not disclose.

confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organization then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

It should be emphasized that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the FAWE nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. It is reasonable to expect staff to use the "*whistle blowing*" procedure rather than air their complaints outside FAWE Liberia.

15.2 POLICY OBJECTIVE

This policy is designed to enable employees of FAWE Liberia to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures such as disciplinary. "*Whistle blowing*" concerns could include.

- Financial malpractice or impropriety or fraud or corruption
- Failure to comply with a legal obligation or Statutes.
- Failure to comply with internal FAWE Liberia policies and procedure/manuals.
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behavior of Senior Management or any other staff

- Attempts to conceal any of the above

15.3 SAFEGUARDS ON "WHISTLEBLOWING"

Protection.

This policy is designed to offer protection to employees who blow the whistle.

- **In good faith** - In making a disclosure, an employee should exercise due care to ensure the accuracy of the information. If an employee makes an allegation in good faith, which turns out not to be true or accurate or misrepresented, no action will be taken against them. However, if an employee makes malicious or vexatious allegations, and particularly if he or she persists in making them, disciplinary action may be taken against them.
- **Reasonable belief** - this is when an employee makes a disclosure that tends to show malpractice or impropriety and if they make the disclosure to an appropriate person. It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the suspected employee.

Confidentiality

- FAWE Liberia will treat all disclosures in a confidential and sensitive manner as stipulated by the Whistleblower and Witness Protection Act of 2021. FAWE Liberia will take all reasonable steps to ensure that confidentiality is maintained in such cases, and that those making complaints are not disadvantaged in any way.
- The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous Disclosures

- This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously cause difficulty in investigations and may be considered at the discretion of FAWE Liberia. However anonymous disclosures that provide adequate detail to a malpractice will be taken seriously and action taken.
- FAWE Liberia management shall discuss all anonymous disclosure and record decisions taken. No disclosure should be ignored. In exercising discretion, the factors to be considered will include:
 - a. The seriousness of the issues raised.
 - b. The credibility of the concern.

- c. The likelihood of confirming the allegation from attributable sources

Reporting Procedure for Making a Disclosure

- i. FAWE Liberia has provided a whistle blower e-mail hotline under fcrm@faweliberia.org. This e-mail hotline is accessed by the FAWE Liberia Board Chair and Risk Management Committee, who on receipt of a complaint or malpractice, will take note of the complaint, and pass this information as soon as is reasonably possible, to a designated investigating officer⁶.
- ii. If there is evidence of criminal activity, then the Chair of the Council will make the decision on involving external stakeholders such as the police. FAWE Liberia will ensure that any internal investigation does not hinder a formal police investigation.
- iii. The findings of the investigation will be communicated in writing to the whistle blower via the mode of communication they used to disclose.
- iv. Where needed, all staff will be informed of the investigation and finding. Disciplinary action may apply if a staff is found guilty of the offence and/or FAWE Liberia may institute criminal proceedings.

Timeline

- i. Due to the varied nature of these sorts of complaints, which may involve internal investigators and/or external help such as the police, it is not possible to lay down precise timescales for such investigations. However, the Organization will take reasonable steps towards speedy resolution. FAWE Liberia staff investigating the matter should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.
- ii. A written acknowledgement as be sent as soon as practically possible of the concern to the complainant indicating receipt and providing assurance that it is being acted upon. All responses to the complainant shall be in writing and sent to their email address : fcrm@faweliberia.org

15. 4 Investigating Procedure

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer shall inform the member of staff against whom the complaint is made as soon as is practically possible. Members of staff will be informed of their right to be accompanied by a representative at any future interview or hearing held under the provision of these procedures.
- The allegations shall be fully investigated by the investigating officer with the assistance where appropriate, of other individuals.
- A decision concerning the complaint and validity of the complaint will be made by the investigating officer(s). This decision will be detailed in a written report containing the findings of the investigations and reasons for the decision. The report will also recommend a

reprimand. The report will be passed to the Chair of the Board and Board Audit and Risk Committee Chair.

15.5 Dissatisfaction with Decision on Whistle Blowing

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, the complainant is not satisfied with the outcome of the investigation.

- i. The disclosing Staff or any other staff interested in the matter are encouraged to write to the Chair of the board clearly indicating the reasons of their dissatisfaction, and where possible provide further information that would lead to a different conclusion and/or review of decision made by investigating officer(s). The Board chair may call for re-investigation based on the new facts and/or make a decision. This decision shall be final.
- ii. FAWE recognises the lawful rights of employees and ex-employees to make disclosures beyond FAWE Liberia. In such instances, FAWE may enter defense explaining its processes and action taken. In case the same disclosure is maliciously instigated to injure FAWE's reputation, FAWE Liberia may institute legal action.

8. Exceptions, Review, and Approval

- Exceptions: Written approval by Executive Director or Board.
- Review: Annually or on significant changes.

Review by:

Executive Director: _____

Hon. Milias Z. Sheriff

Date: 07/07/26

Approved by:

Chairperson, Board of Directors: _____

Atty. Evelyn E. Barry

Date: 07/07/26

INDEPENDENT
OF GIRLS & WOMEN