

Summary of the Process



Goal of the process:

The policy provides an alternative channel to other reporting systems to learn of serious problems so that they can be resolved quickly

Critical Process Indicator:

Whistleblower reports dealt with effectively and reported back to Whistleblower

Involved functions:

Whistleblower (any ICCO staff, partner or beneficiary), Manager, Executive Board, Human Resources Department, unit Quality and Audit Services

Risks mitigated through this procedure:

- Serious problems unknown by management /EB due to fear
- Victimization of Whistleblower

Risk Type

operational staff

Process controls

- Reporting of cases to EB, HR and QAS
- Annual Reporting to EB and Audit Committee
- Inclusion in corporate annual report

Frequency

Per case
Annual
Annual

1. Introduction

The ICCO whistleblower policy aims to reinforce the organization's commitment to its policies, values, attitudes and behavior. The policy provides an alternative channel to other reporting systems to learn of serious problems so that they can be resolved quickly.

2. Description

Policy

This policy applies to all staff of ICCO, the staff of partner organizations and the involved beneficiaries of ICCO's projects. The policy covers the responsibility to report wrongful acts committed by staff of ICCO and those of partner organizations.

Wrongful acts in this sense are described as:

- Financial and procedural malpractice including those relating to mismanagement, misappropriation of funds, actual or suspected fraud, abuse of authority and non-compliant behavior with the ICCO Codes of Conduct
- HR related matters, such as (sexual) harassment, bullying, aggression, violence and discrimination

Under this policy, it will be a disciplinary matter if a genuine whistleblower were to be victimized.

While the policy does not specifically cover ex-employees of the organization, reports received from and about ex-employees will be considered for investigation. Members of staff are however encouraged to report any wrongful act whilst still in the employment of the organization. Confidential cases reported during investigations or internal audits will be handled according to this whistleblower policy.

Reporting responsibility

It is an obligation for all ICCO staff to report wrongful acts or suspected wrongful acts in accordance with this whistleblower policy. Members of staff of partner organizations and beneficiaries are also required to report such acts committed by ICCO staff or their own staff in the execution of their partnership agreements.

Reports can be made as follows:

Financial and procedural malpractice:

Any employee of ICCO, of a partner organization or beneficiary who observes any improper practice or wrongful conduct on the part of an ICCO member of staff or of a partner organization should report such observations to the first Manager in line. The Manager will inform the Executive Board about the received report on a case by case basis. The call shall be forwarded to the unit QAS on the email address qas@icco.nl.

Where the alleged wrongdoing relates to the conduct of the Manager, the case should be reported to the Executive Board in Global Office. Cases should be addressed to the unit QAS on the email address qas@icco.nl. QAS will share the report with the Executive Board.

HR related matters:

Any employee of ICCO, of a partner organization or beneficiary who observes any improper practice or wrongful conduct on the part of an ICCO member of staff or of a partner organization, such as (sexual) harassment, bullying, aggression, violence and discrimination should report such observations to the first Manager in line. The Manager will inform the Executive Board about the received report on a case by case basis. The call shall be forwarded to the HR department on the email address hr@icco.nl.

Where the alleged wrongdoing relates to the conduct of the Manager, the case should be reported to the Executive Board in Global Office. Cases should be addressed to the HR department on the email address hr@icco.nl. HR will share the report with the Executive Board.

Confidentiality and anonymity

Cases may be reported on a confidential or anonymous basis by the whistleblower. The confidentiality and anonymity of the reports will be kept to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of reported cases

The Manager, unit QAS or HR department who receives a report will acknowledge receipt of the report within seven business days. All reports should be properly investigated by the Manager, Internal Auditor or HR Officer where applicable.

Upon investigation, the Manager or the Executive Board should take the appropriate corrective action warranted by the outcome of the investigation. In all cases the set-up and outcome of the investigation are shared and approved by the Executive Board.

There may be occasions when external bodies such as donors and external auditors will be notified of the outcome of an investigation.

The whistleblower will also be notified of the outcome of an investigation.

On an annual basis, issues raised through whistleblowing will be tracked and reported to the Executive Board in the annual report of the unit QAS and HR.

ICCO also reports all cases in its corporate annual report.

False Allegations

Any allegation which proves to have been malicious or knowingly false will be viewed as a serious disciplinary offence. Any personal interest should be made known when first raising concerns.

Notification

All Managers are required to notify and communicate the existence and contents of this policy to the employees of their Department/RO and all new employees respectively. Managers should also ensure that long-term partners and beneficiaries are made aware of their responsibility to report any wrongful conduct of ICCO staff in the execution of a partnership agreement.

Complaints procedure

ICCO staff subject to this procedure who believe that his/her rights are violated can make a formal complaint in accordance with the ICCO HR Complaints procedure.

3. Registration and filing

The following output documents need to be filed in a digital archive:

<i>Name Document</i>	<i>Who files?</i>	<i>Where?</i>	<i>For how long?</i>
Original notification by Whistle blower and all following documents and correspondence	QAS, HR	Archive	3 years
Involvement EB (via minutes)	EB support office	Archive EB	3 years

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