Whistleblowing

GLOBAL INITIATIVE
AGAINST TRANSNATIONAL ORGANIZED CRIME

The Global Initiative's formal mechanism for whistleblowing allows someone to report alleged misconduct or wrongdoing that is, or could become, detrimental to the organization's activities, integrity and reputation, without fear of any retribution or harassment. The types of allegation that would be covered by whistleblowing might include:

- Financial or operational mismanagement within GI;
- Unethical or unlawful conduct by any employee, consultant or business partner (e.g. discrimination, bribes, receiving extravagant gifts);
- Serious breach of GI or donor policies and regulations;
- Harassment (undue pressure on a person to gain an advantage).

The Whistleblowing Policy does not cover Human Resources concerns or issues such as salaries and fringe benefits, promotions, etc. A serious breach of HR existing policies would nevertheless be covered under the Policy.



WHO IS ABLE TO WHISTLEBLOW

Anyone with knowledge of potential misconduct or wrongdoing can whistleblow, including staff, consultants, donors and partners, provided that they are:

- Willing to be named to the initial responder of the report. This is important to ensure that all relevant information can be sourced and collected. Confidentiality is guaranteed to the whistleblower and only the initial responder will know who they are and will contact the whistleblower about the report. Anonymous reports will therefore not be considered.

- Acting in good faith and have reasonable grounds for believing that the information disclosed constitutes a potential violation. As such, the Policy does not protect a whistleblower if s/he has willfully made allegations that s/he knew were false or made with intent to misinform. In such a case, disciplinary measures could be taken.

INVESTIGATING AN ALLEGATION

After receiving a report, the responder will first determine whether there are sufficient grounds to undertake an investigation. If needed, they will contact the whistleblower for further information.

If the report is not within the scope of the whistleblowing policy, then they will inform the whistleblower accordingly and advise him/her to use another channel.

If the report is considered as having sufficient substance and falling within the scope of the Policy, the responder will "anonymize" the report by removing the name of the whistleblower from the report.

They will then forward the report to a special Investigation Committee in order to investigate the complaint. The Investigation Committee will be composed of members of Global Initiative's Board and depending on the nature of the case, potentially members of the Senior Management and/or external stakeholders in the investigation.

These investigations will be carried out in complete independence and confidentiality.

The Investigation Committee will report its findings and possible action taken (or to be taken) to back the responder, who will be tasked with informing the whistleblower.

The Global Initiative's Board has approved the policy and it will continued to be reviewed and accepted by the Board annually in order to ensure that it is fit for purpose.

The Chair of the Board will periodically receive reports from the Chair of the Audit and Finance Committee about the level and nature of the reports made, as well as the result of investigations undertaken.

MAKING AN ALLEGATION

The whistleblower will need to approach one of the appointed named contacts at the Global Initiative who are able to investigate a whistleblowing allegation. The reason that there is more than one person is in order to ensure that it is possible for potential allegations to be freely made against every person and part of the organisation.

The current named contacts at the Global Initiative who are able to receive a whistleblowing allegation are:

- **Gwen Boniface (Chair of the global GI-TOC Board)**
  gwen_boniface@hotmail.com
- **Tuesday Reitano, Deputy Director**
  tuesday.reitano@globalinitiative.net
- **Marc Hofstetter, Chair of the Finance and Audit Committee**
  Hofstetter@hdcentre.org

If the whistleblower has concerns about approaching any of these people, then they should use the CiC independent whistleblowing hotline:

phone: 0800 197 2814
e-mail: blowingthewhistle@cicwellbeing.com

Another member of the Board can also be approached. In this case, the Chair of the Board should not be approached, as this person needs to remain independent of the allegations and investigation in order to be able to act without prejudice in the case of an appeal.

The allegation can be made in person, by phone, letter or email, although the whistleblower should state upfront that they are making an allegation under the whistleblowing policy so that the responder can ensure that the appropriate confidentiality steps are taken from the beginning.

The information provided by the whistleblower needs to be as detailed as possible, for example:

- What is the type of alleged wrongdoing?
- Where, when and how did it occur?
- Who are the persons involved?
- How was it discovered?
- Has the whistleblower any proof or supporting evidence of the wrongdoing that is being reported?

PROTECTIONS FOR WHISTLEBLOWERS

The person who receives the complaint is responsible for keeping the name of the whistleblower confidential; only this initial responder will have access to the name of the person providing the information and will be the only source of contact to the whistleblower.

Confidentiality is guaranteed to the person reporting alleged wrongdoing. For this reason, anonymous reports are neither considered, nor treated.

No whistleblower who reports a potential violation in good faith will suffer any form of retaliation.