



**Protecting women and children against violence**

## **Whistle Blower Policy**

**Whistleblowing** for the purpose of this policy is the act of reporting perceived unethical conduct of employees, management, directors, and other stakeholders by an employee or other persons to appropriate authorities.

Whistleblowing law is located in the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for an employee or other persons to take a case to an employment tribunal if they have been victimized at work or they have lost their job because they have blown the whistle. MIFUMI Uganda will draw on Uganda Labour Laws (based on English common law imported wholesale from the UK in 1902 while Uganda was a British Protectorate).

MIFUMI is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers. This policy outlines a procedure for employees, management, directors and other stakeholders to report actions that they reasonably believe violates a law, or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter, which is related to MIFUMI's business and does not relate to private acts of an individual not connected to the business of MIFUMI. If an employee or other persons has a reasonable belief that an employee, management, directors, other stakeholders or MIFUMI has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the employee or other persons is expected to immediately report such information to the Executive Director.

If the employee or other persons does not feel comfortable reporting the information to the Executive Director, he or she is expected to report the information to the head of HR or the designated person with whistleblowing responsibility on MIFUMI's Board of Directors.

## **Whistle blowing and safe guarding**

MIFUMI will protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties particularly in relation to vulnerable children and adults as set out in MIFUMI's Safe guarding policy.

All reports will be followed up promptly, and an investigation conducted. In conducting its investigations, MIFUMI will strive to keep the identity of the complaining individual as confidential as possible, while conducting an adequate review and investigation. MIFUMI will not retaliate against an employee in the terms and conditions of employment because that employee: (a) reports to a supervisor, to the executive director, the Board of Directors or to a state or local agency what the employee believes in good faith to be a violation of the law; or (b) participates in good faith in any resulting investigation or proceeding, or (c) exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee's rights.

MIFUMI may take disciplinary action (up to and including termination) against an employee or other persons who in management's assessment has engaged in retaliatory conduct in violation of this policy.

[In addition, MIFUMI will not, with the intent to retaliate, take any action harmful to any employee or other persons who has provided to law enforcement personnel or a court truthful information relating to the commission or possible commission by MIFUMI or any of its employees, management, directors or other stakeholders of a violation of any applicable law or regulation.]

Supervisors will be trained on this policy and MIFUMI's prohibition against retaliation in accordance with this policy.

## **Whistleblowing and external disclosures**

MIFUMI will endeavor to ensure employees feel able to make a disclosure to the organisation. The policies and procedures for handling whistleblowing will help encourage this. However, there may be circumstances where an employee feels unable to make a disclosure to the organisation. There are other ways, some of which are set out in law, that a worker may make a disclosure without losing their rights under whistleblowing law. One option for external disclosures of this type is prescribed persons such as MPs or appropriate authorities.

## **Promoting and dissemination**

MIFUMI will take steps to promoting our Whistleblowing policy and making sure it is easily accessible including on the MIFUMI website.

We will promote the policy by:

- Making the policy publicly available on the website
- Holding staff sessions and requiring managers to hold smaller, consistent team meetings
- Make the policy accessible on the staff intranet and on MIFUMI website
- Appoint a Whistle-blowers' champion to drive the commitment to valuing whistleblowing and protecting whistle blowers within the organization.
- Use promotional posters around the building
- Include the policy within induction packs for newcomers
- Set the policy out in staff handbooks and contracts

MIFUMI is genuinely open to hearing concerns from its staff and will endeavor to create an open culture in order to increase the likelihood of a worker speaking up about any wrongdoing they come across. Training will be provided to all staff on the key arrangements of the policy. Additional training will be provided to those with whistleblowing responsibilities, such as managers or designated champions, so they are able to provide guidance confidently to workers. Managers will be expected to lead by example and ensure they are committed to creating an open culture where disclosures are welcome. MIFUMI will include handling whistleblowing disclosures as part of discipline and grievance training for managers and staff. Training will be offered at regular points to make sure it stays fresh in managers' minds and to capture any newcomers to the organization.

Reviewed and approved by the Board of MIFUMI UK and MIFUMI UGANDA

Name: Dr Ravi. K Thiara

Name: Dr Anthony Okoth

Title: Chairperson MIFUMI UK

Title: Chairperson MIFUMI UGANDA

Signed:



Signed:



Dated: 6/21/2019

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