

Policy Summary

Whistleblower Policy

June 2019

PREAMBLE

This policy is fundamental to FAITH's professional integrity, providing a method for individuals and groups to properly raise bona fide concerns about FAITH's operations, with protection from victimization, harassment, or disciplinary proceedings. It is not designed to question program, financial, or business decisions taken by FAITH.

3 Categories of malpractice: fraud, general malpractice, gross misconduct	2 Reporting channels: supervisor or Disinterested Committee	6 months Deadline to file a retaliation complaint	June 2019 Policy adopted
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About this Policy

An important aspect of accountability and transparency is a mechanism to enable individuals and groups to voice concerns in a responsible and effective manner when they discover information believed to show serious malpractice or unethical conduct. This Whistleblower Policy reinforces the value FAITH places on employees being honest and respected members of society, providing a method for properly addressing genuine concerns and protecting whistleblowers from victimization, harassment, or disciplinary proceedings.

Key Definitions

- **Whistleblowing** — confidential disclosure by an individual or group of any concern encountered in the workplace relating to a perceived wrongdoing or misconduct.
- **Whistleblower** — a director, manager, employee, contractor, or volunteer of FAITH who, anonymously or not, makes or wishes to make a report of reportable conduct and seeks protection from retaliation for having made it.
- **Retaliation** — direct or indirect detrimental management action taken against someone who has reported a wrongdoing — including being rebuked, given less desirable work, dismissed, or passed over for promotion.
- **Protected Disclosure** — a good-faith communication that discloses or demonstrates an intention to disclose information evidencing improper activity or malpractice, which may lead to a whistleblowing disclosure.
- **Malicious Whistleblowing** — allegations made with reckless disregard for their truth, or made maliciously or in bad faith — including those based on misogyny, religious or cultural beliefs, hearsay, personal dispute, or forged documents.

Categories of Wrongdoing or Misconduct

Category	Description
Fraud	Any action or intentional omission, coupled with an element of deception, that enables someone to receive direct or indirect benefits at FAITH's expense — including theft or misuse of funds, falsification of costs, forgery, destruction of documents, or bribery.
General Malpractice	Any intentional violation of the Code of Ethics and Conduct or the Conflict of Interest Policy, or practices endangering the health, safety, or environment of staff, volunteers, or the public.
Gross Misconduct	Sexual harassment, blackmail, extortion, or physical abuse.

Duty to Report & Procedure to Disclose

Where an employee or individual associated with FAITH believes, on reasonable grounds, that another employee, volunteer, or contractor has engaged in malpractice, they must report their concerns to their Supervisor, or to a member of the Disinterested Committee if they feel their supervisor may be complicit. Reports should be made through open communication — phone call, email, or personal contact — rather than anonymous letters, to generate seriousness and produce a quicker response.

A formal whistleblower disclosure must include identification of the individual(s) involved, the status or nature of any management involvement, the nature, duration, and location of the alleged malpractice, the facts on which the whistleblower believes a violation occurred, and any evidence or witness information available.

Investigation & Resolution

On receiving a report, the person to whom the disclosure is made escalates it to the Disinterested Committee, which conducts a preliminary investigation. Allegations judged trivial, fanciful, or malicious are dismissed with notice to the person making the allegation; allegations judged significant or having gravity put an investigation process in motion.

- The allegation is reviewed in confidentiality, with the whistleblower contacted to justify their claims if needed.
- An investigation plan is drawn up, proportionate to the seriousness of the allegation, with sufficient resources allocated.
- The alleged individual is given the opportunity to provide input and evidence in their defense; all relevant witnesses are interviewed and documents examined.
- Strict security is maintained throughout, and the case is heard without bias, acting only on evidence.

Following investigation, the Committee may take disciplinary action (up to and including dismissal) against the individual alleged of malpractice, disciplinary action against the whistleblower if the claim is found malicious or in bad faith, or no action if the allegation is unfounded and made in good faith. Both parties are kept informed of the progress and outcome, within the constraints of confidentiality.

Dealing with Malicious Whistleblowing

Where a whistleblower is deemed by the Committee to have acted maliciously or in bad faith, their identity may be disclosed and corrective measures may include a financial penalty or termination for a FAITH employee, scaling down or termination of a sub-grantee or partner relationship (including blacklisting from future grants), or legal action including libel or slander charges.

Whistleblower Protection Policy

All allegations made in good faith with reasonable belief — even those not sustained during investigation — are treated as a protected disclosure and kept confidential. FAITH does not condone any retaliation against an employee reporting in good faith within the scope of this policy, and takes appropriate measures to ensure whistleblowers are safeguarded through sensitivity, confidentiality, and disciplinary penalties for anyone who victimizes or deters a legitimate report. FAITH will enforce mandatory discipline against staff or associates where retaliation is proven to have taken place.

Complaint Against Retaliation

Individuals with reasonable grounds to believe retaliatory action has been or will be taken against them may file a complaint with their Supervisor or the Disinterested Committee, within 6 months of the alleged act or threat. To be accepted, the complainant must have filed a whistleblower report, alleged they were threatened or prevented from filing one, or refused to obey an illegal order — and the complaint must identify the retaliating individual, the nature of the retaliation, and supporting evidence.

The Disinterested Committee receives and acknowledges retaliation complaints, keeps a confidential record, and conducts a preliminary review. Where retaliation is established, the Committee, in consultation with the Executive Board and the complainant, recommends corrective measures such as withdrawal of the retaliatory decision or

reinstatement/transfer. Any retaliation against a whistleblower, by FAITH personnel or an external stakeholder, is treated as a violation of FAITH's standard of conduct and leads to appropriate administrative or disciplinary action.

This summary is published by FAITH for transparency and accountability. It is a condensed presentation of the internal Whistleblower Policy (June 2019); in case of any discrepancy, the full internal policy document prevails and is available on request.