



PEACE, PROSPERITY AND  
REGIONAL INTEGRATION

# **INTERGOVERNMENTAL AUTHORITY ON DEVELOPMENT**

## **WHISTLEBLOWING POLICY**

<b>TITLE</b>	<b>WHISTLEBLOWING POLICY</b>
<b>DATE CREATED</b>	<b>NOVEMBER 2021</b>
<b>POLICY CUSTODIAN</b>	<b>INTERNAL AUDIT DIVISION</b>

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## 1. Policy Statement

Whistleblowing is an important component of the governance system of an organisation, while whistle blowers may face retaliation. IGAD whistleblowing policy is intended to encourage and enable staff members to raise serious concerns and to make it clear that IGAD will take the necessary steps to protect whistle-blowers. The policy reinforces its commitment to conducting its activities with honesty and integrity and to compliance with its policies, values, attitude, and behaviours. The policy has been designed to allow staff to disclose information that they believe shows malpractice, unethical conduct, or illegal practices in the workplace, without being penalised in any way. This includes protecting staff from any detriment or discrimination if they do report improper or illegal conduct within the organisation. This policy affirms IGAD's position, whistle-blowers have a right to be anonymous and employees will not face any retaliation or abuse for raising concerns.

The policy will provide alternative channels through which reporting of suspected wrongdoing can be done, in the knowledge that the concerns will be taken seriously and investigated appropriately, in a way which will ensure that those who raise genuine concern can do so without fear of retaliation.

## 2. Definitions

Whistleblowing: Whistleblowing can be described as giving information about potential illegal and/or unethical practices, i.e. wrongdoing.

Wrongdoing: Wrongdoing involves behaviour that can result in financial harm or bring discredit to IGAD. It includes but is not limited to:

- An unlawful act, whether civil or criminal in the applicable Member State or country where the act occurred;
- Acceptance or offering of bribes for favours related to their association with IGAD;
- Undue favouritism or discrimination with respect to national, religious, tribal, or other ethnic groups in hiring, procurement, provision of service or any other form;
- Conflict of interest
- Breach of or failure to implement or comply with any published IGAD policy;
- Knowingly breaching IGAD's regulations;
- Serious unprofessional conduct;
- Questionable or fraudulent accounting or other practices;
- Misuse of assets;
- Knowingly making a misstatement;
- Dangerous practice likely to cause physical harm/damage to any person or property;
- Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to IGAD or a project;
- Abuse of power or authority for any unauthorised or ulterior purpose;
- Sexual harassment;
- Providing false information on official documents or reports
- Risking the organisation's resources;
- Consistently overriding controls.
- Others (any wrongdoing not on the list)

Investigation team: is a team established by Executive Secretary to be responsible for

- Receiving whistleblowing wrongdoings
- Investigating the wrongdoings
- Making a decision based on the outcome of the investigation
- Reporting the outcome to the relevant top leadership of IGAD
- Ensuring protection of whistle-blowers

### 3. Basic Policy

Any IGAD or project staff/supplier/conference attendee/consultant/recipient/affiliated person or organisation that makes a disclosure or raises a concern under this Policy will be protected if he/she:

- Discloses the information in good faith
- Believes it to be substantially true
- Does not act maliciously or make false allegations; and
- Does not seek any personal or financial gain

Warning: making any deliberately false or malicious allegations is a serious disciplinary offence, and also a civil or criminal offense, which may result in disciplinary or legal action against you.

### 4. Procedure for Whistleblowing

The aim of this procedure is to determine how the principles laid out in the Whistleblowing policy are implemented and used, by facilitating whistle-blower reporting. This is ensured by creating reporting channels for effective and timely response and informing employees about the steps to take. The reporting channels will also protect the whistle-blower against retaliation, while protecting the organization and employees against false or malicious allegations. Below, the information to be shared with any person who wishes to report wrongdoing.

Anyone with a complaint or concern about IGAD can choose to make a report either anonymously, non-anonymously or semi-anonymously. IGAD will facilitate this by providing a suggestion box at site, providing an email address through which staff can make whistleblowing reports and create an online portal on the IGAD website through which whistleblowing reports can be made. The form should also be printable with a checklist to facilitate physical filling and subsequent sharing with the Executive Secretariat to enhance anonymity.

In the case of a wrongdoing, various channels for reporting are available.

- 1) Option 1 – If you are an IGAD employee**
  - a. Your immediate supervisor
  - b. Your director
- 2) Option 2: If you are an IGAD employee and the complaint/report is against your supervisor or director,**
  - a. Human Resources Officer
  - b. Internal Audit,
- 3) Option 3: if you are an IGAD employee and the complaint / report is against your supervisor or director, and you have reason to believe the internal audit or the HR office cannot handle the situation, for cause of conflict of interest for example.**
  - a. Executive Secretary,
  - b. Designated Audit Committee Member
- 4) Option 4: If you are not an IGAD employee or if you do not wish to disclose your relationship with IGAD**

In case of a paper complaint/ report, the whistleblower will provide an address where they can receive the response from IGAD. For the online form, they will provide an email address and other contact details as they deem appropriate for receiving a response from IGAD.

## 5. IGAD's Response and Timescale

IGAD will take the following steps to investigate the complaints received.

Within **15 calendar days** of a concern being raised, IGAD will write to you with the following information

- Acknowledgement that the concern has been received;
- How IGAD proposes to deal with the matter;
- Any initial enquiries made;
- Any further information needed from you
- Any further investigations that will take place
- Estimated timeline to provide a final response.
- If your report has been dismissed, the reasons for its dismissal

If urgent action is required, it will be taken before any investigation is conducted. Concerns will be investigated as quickly as possible. The seriousness and complexity of any complaint may have an impact on the time taken to investigate a matter. The amount of contact between the persons considering the issues and the whistle-blower will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, IGAD will seek further information from the whistle-blower. IGAD will take steps to minimise any difficulties which the whistle-blower may experience as a result of raising a concern. IGAD accepts that the whistle-blower needs to be assured that the matter has been properly addressed. Thus, subject to legal constraints, IGAD will inform the whistle-blower of the outcomes of any investigation.

## 6. Prevention of Recriminations, Victimization and Harassment

IGAD will not tolerate an attempt on the part of anyone to apply any sanction, detriment or punishment to any persons who have reported to IGAD a genuine concern that they may have concerned an apparent wrongdoing. Retaliation against staff who report concerns in good faith is against IGAD's policy and IGAD will take all reasonable measures to protect all legitimate whistle-blowers from any retaliation, ostracising, discrimination or subsequent disadvantage. If, having made a report of suspicious conduct, the whistle-blower subsequently believes that he/she has been subjected to retaliation or mistreatment of any kind, he/she should immediately report it to his/her Director, Internal Audit, the Human Resources Officer, or Committee of Ambassadors or IGAD Audit Committee member. Reports of retaliation will be investigated promptly, in a manner intended to protect confidentiality, consistent with a full and fair investigation. The party conducting the investigation will notify the whistle-blower of the results of such investigation. Any staff member who is found to have engaged in retaliation to or mistreatment of a whistle-blower will be subject to discipline.

## 7. Protection and Prevention of Retaliation

IGAD will not tolerate an attempt on the part of anyone to apply any sanction, detriment or punishment to any persons who have reported to IGAD a genuine concern that they may have concerning an apparent wrongdoing.

If you believe that you have been subjected to retaliation or mistreatment of any kind because of a report/ complaint, you should immediately report it to

- your Director,
- Internal Audit,
- Human Resources Officer or
- A member of the IGAD Audit Committee

If you are not an IGAD employee

- Designated recipient
- The Executive Secretary
- A member of the IGAD Audit Committee

Reports of retaliation will be investigated promptly, and the of the results of such investigation will be notified to the concerned.

Any staff member who is found to have engaged in retaliation to or mistreatment of a whistle-blower will be subject to disciplinary measures. The organization shall engage legal action against any party who is found to have subjected an IGAD employee to any kind of mistreatment because of a report or complaint.

## 8. Confidentiality and Anonymity

IGAD will respect the confidentiality of any whistle-blowing complaint received by IGAD when the complainant requests confidentiality. However, it must be appreciated that it will be easier to follow up and to verify complaints if the complainant is prepared to give his or her name. In addition, confidentiality cannot be maintained if such confidentiality is incompatible with a fair investigation or if disclosure of the identity of the complainant is required by law. If anonymity is requested, the person may request anonymity of the Internal Auditor, Executive Secretary or Council Member, or he/she may send an anonymous message to the Internal Auditor.

## 9. Reporting Provisions

IGAD has designated the following officer/individuals based on the categories to be responsible for receiving the complaints.

Position	Name	Email/Telephone
Internal Audit Division		
Human Resources Officer		
Designated Member of IGAD Audit Committee		

Note: Individual members of the Committee of Ambassadors\* can also be contacted through their embassy in Djibouti, preferably for more serious issues.

The various ways that IGAD employees or any stakeholder can whistleblow are;

- Online – IGAD Website (Via the whistleblowing portal)
- Email address (to be availed on the website)
- In person
- Complaint box