

Whistleblowing & Confidential Reporting

| Guideline

Purpose

The purpose of this guideline is to provide a confidential and secure framework for employees, contractors, volunteers, and other stakeholders of HOPE International Development Agency to report suspected wrongdoing or risks of harm within the organization's direct or associated operations or activities, without fear of retaliation in any form, including victimization, discrimination, disadvantage or dismissal. Further, the policy is also intended to establish and maintain a supportive working environment where employees, contractors, volunteers, and other stakeholders feel encouraged and enabled to raise serious concerns within the organization, rather than ignoring a problem or feeling a public complaint is their only option.

Scope

This guideline applies to all employees, contractors, volunteers, board members, and stakeholders associated with HOPE International Development Agency, covering all types of wrongdoing and misconduct, including financial improprieties, fraud, corruption, illegal actions, sexual exploitation, abuse, and harassment, other breaches of HOPE policies, and any other unethical behaviour within the scope of any and all activities and operations that HOPE is implementing directly or by association.

Objectives and Principles

Transparency and Accountability: Foster a culture of openness, integrity, and accountability within the organization.

Protection: Ensure protection for individuals who report allegations of misconduct from retaliation, harassment, or victimization.

Responsiveness: Commit to acting promptly and fairly in investigating all reports of misconduct.

Confidentiality: Uphold the confidentiality of whistleblowing reports to the fullest extent possible, unless required by law to disclose specific information.

Responsibilities

Board of Directors: Ensure the implementation and adherence to the whistleblowing and confidential reporting guideline.

Snr Leadership: Oversee the investigation of reports and enforce guideline adherence. Receive, assess, and investigate reports of wrongdoing confidentially.

Employees, Volunteers and other Stakeholders: Report any suspicions of misconduct in accordance with the guideline.

Guidelines / Procedures

Reporting Mechanisms / Making a Complaint

- Anyone has the right to make a complaint about the behaviour of those associated with HOPE and its programs including any inappropriate behaviour of other employees or volunteers.
- Any manager who suspects inappropriate behaviour should seek immediate advice from HOPE Senior Leadership / Management and Human Resource staff. Complaints from people external to HOPE will be dealt with first by the Director for Overseas Programs. Complaints must be reported as soon as possible after an incident takes place. However, an investigation may go ahead no matter how long ago an incident occurred and no matter whether the complainant wishes to take an active part.
- Multiple confidential reporting channels are available, with specific details provided in Annex One.
- All reports related to Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment, will be submitted on a biannual basis to CHS Alliance's Harmonised Data Collection and Reporting Scheme. To ensure privacy, the data provided is anonymized and limited to the Reporting Framework:
https://d1h79zlgfht2zs.cloudfront.net/uploads/2022/09/SEAH-HRS_Final-framework.pdf

Investigation Process (KPI: 102-132 business days)

Acknowledgment of Report

- An acknowledgment of the report will be sent to the whistleblower /reporter (if not anonymous) confirming receipt of the report, within 2 business days of receipt.

Preliminary Assessment

- A preliminary assessment to determine the specificity, credibility, corroborative details, and seriousness of the report will be conducted within 5 business days of acknowledgment, including a recommendation on next steps.

Decision and Notification

- If the recommendation is to proceed with a full investigation, the Director for Overseas Programs will notify the appropriate internal or external bodies about the decision to investigate.
- If the recommendation is to not proceed with a full investigation, the reasons of the decision and rationale will be documented.

- In both instances, the whistleblower/reporter (if not anonymous) will be informed of the decision within 10 business days of the preliminary assessment.

Assignment of Investigation Team

- The Director for Overseas Programs will form an investigation team, which may include internal staff or external experts, depending on the nature of the report and required expertise, within 5 business days of the decision to investigate.

Investigation Plan

- An investigation plan will be developed within 10 business days of the formation of the investigative team, outlining the following:
 - Objectives and scope of the investigation.
 - Methodology and resources required.
 - Timeline and milestones.
 - Confidentiality measures.

Execution of Investigation

- Depending on the complexity of the case, the investigation will be implemented and completed within 30-60 days from the start of the investigation, and may involve the following:
 - Interviews with the whistleblower/reporter (if available), witnesses, and suspects.
 - Review of documents, emails, financial records, and other relevant materials.
 - Collaboration with legal or regulatory bodies if necessary.

Investigation Report

- A detailed report of the investigation findings will be prepared within 20 business days of the completion of the investigation, including:
 - Summary of the allegations and investigation scope.
 - Description of the investigative process and evidence reviewed.
 - Findings and conclusions.
 - Recommendations for disciplinary action, policy changes, or other corrective measures.

Review and Decision

- A decision on the recommended next steps, including any disciplinary actions, policy updates, or preventive measures, will be made within 15 business days of receiving the investigation report.

Notification and Follow-up

- The whistleblower/reporter (if not anonymous) and other relevant parties of the investigation will be notified of the outcome and any actions taken or planned within 5 business days of the decision.

Documentation and Closure

- Documentation of all steps taken from the receipt of the report to the investigation's conclusion and actions taken and securely stored for future reference or audits.

Note: These timelines are guidelines and may need adjustment based on the specific circumstances of each case or organizational protocols. The key is to act promptly, maintain confidentiality, and ensure a thorough and unbiased investigation process.

Protection Measures:

To ensure the confidentiality and protection of whistleblowers/reporters, as well as to support victims of misconduct such as sexual exploitation, abuse, and harassment, several measures and mechanisms are crucial.

Confidentiality of Whistleblower/Reporter Identity

1. Secure Reporting Channels: A whistleblower can utilize HOPE's Confidential Complaint Form, or send a written report to the Executive Director or the Director for Overseas Programs. Both options allow for absolute anonymity of the whistleblower / reporter.
2. In line with HOPE's E-safety and Digital Content Policy, strict protocols to ensure that the identity of the whistleblower and the information provided are kept confidential will be maintained throughout the investigation process.

Protections Against Retaliation

1. As per this guideline, any retaliation against whistleblowers or other reporters is prohibited, with consequences for those who engage in retaliatory actions.
2. Regular monitoring of the workplace environment and auditing of whistleblower and other cases will be conducted by the Senior Leadership team and / or the Chair of the Board (dependent upon need). Monitoring will include reviewing the employment status of whistleblowers, monitoring changes in work conditions, and conducting follow-up interviews to assess any concerns of retaliation.
3. Upon receiving a report of retaliation, HOPE will initiate a thorough and impartial investigation to determine the validity of the retaliation claim, maintaining the confidentiality of all parties involved.

4. Additional guidance on protecting whistleblowers and preventing retaliation is available in the [U.S. Equal Employment Opportunity Commission's Enforcement Guidance on Retaliation and Related Issues](#).

Definition of Retaliation

Retaliation refers to any adverse action taken against a whistleblower or a victim of a report as a consequence of reporting misconduct. This can include, but is not limited to, job termination, demotion, harassment, bullying, exclusion, and any form of professional or personal reprisal.

Support Mechanisms for Whistleblowers and Victims

1. Psychological Support: Access to counselling and psychological support services is available to help whistleblowers and victims cope with the stress and potential trauma resulting from their experiences.
2. Awareness and Training Programs: Awareness programs and training will be conducted for all employees on the importance of whistleblowing, the protections available, and how to report misconduct safely.
3. Further details on measures and mechanisms to support Whistleblowers and Victims is available at the following links:
 - [UNODC Resource Guide on Good Practices in the Protection of Reporting Persons](#)
 - [IUCN Whistleblowing and Anti-retaliation Policy](#)

Grievances

A grievance process is available to HOPE staff and volunteers in the case they feel they have been unfairly targeted in any Whistleblowing or other reports.

It is HOPE 's duty to ensure staff and volunteers feel comfortable to openly discuss a grievance and feel that they will be taken seriously.

A thorough procedure will be implemented to ensure all grievances are addressed properly and completely and will include HOPE Senior Leadership / Management and Human Resource staff.

(a) A grievance will be investigated and dealt with by the HOPE Senior Leadership / Management and Human Resource staff.

(b) A grievance will be reviewed with the complainant as quickly as possible, making sure the investigative team fully understands the complaint and, with the accused, discusses the grievance in detail, including options and preferences for resolving the grievance.

(c) The grievance will be documented in writing identifying areas for concern and any witnesses that may provide pertinent details of the incident.

(d) The complainant will be made aware of how long the grievance investigation may take and ensure there is ongoing regular communication with the complainant so they are satisfied their complaint is being handled appropriately.

(e) In cases where the complainant or accused includes any member of HOPE Senior Leadership / Management and Human Resource staff, that person will not be involved in any investigative or decision-making role of the grievance, and the grievance will be escalated to, at minimum, the next level of employee in the organizational structure, up to Board Chair when a complaint involves Board members and / or the Executive Director.

(f) After the investigation has been completed a meeting will be arranged with the complainant to discuss the results of the investigation.

(g) The complainant will be informed of the outcome of the investigation and the results confirmed in writing. Recommendations will be implemented and recorded.

(h) The complainant will be informed of any recommendations of actions to be taken. The issue will not be discussed with any other parties.

(i) If the complainant does not agree with the outcome of the investigation they may be given the opportunity to appeal. If they decide to appeal, this should be confirmed in writing, bearing in mind that it is not legally necessary for them to explain why they are appealing the decision.

(j) Best practice stipulates an appeal hearing should have a senior staff member of HOPE staff involved, at a level appropriate to the other parties of the investigation. The complainant has the right to be accompanied during this meeting.

(k) After the appeal the complainant will be made aware of the outcome in writing as reasonable soon as possible.

(l) If a compromise among the conflicting parties cannot be reached, HOPE's Senior Leadership team will prepare a written report describing the conflict, the attempts that have been made to resolve it, and the reasons for not reaching a solution. This report will be submitted to the next higher level of supervision, up to and including the Board Chair when a complaint involves Board members and / or the Executive Director.

(m) HOPE will regularly monitor and review the number and types of grievances received, as well as the action taken in response, to ensure grievances are being appropriately handled. HOPE will also monitor the number and type of grievances received to understand if the complaint mechanisms in place are appropriate and adequate. If complaint channels are not being used, it is not necessarily an indication that there is no exploitation or abuse occurring. The complaint channel must be appropriate so that people feel comfortable to use it, especially the most vulnerable.

Exceptions

Whilst the primary intention of this guidance is to encourage and protect individuals who report concerns, as per the Criminal Code of Canada there are exceptions which may apply when reports are not made in good faith, as in when a false claim is knowingly made with the primary intent to harm another individual or the organization. In cases where there is plausible information that an accusation of complaint/s has not been made in good faith, the Executive Director will conduct an assessment and make recommendations for follow-up, for approval by the Board. However, it is emphasized that any complaint where the information cannot be confirmed does not automatically categorize the complaint as false or made in bad faith, again emphasizing that the primary lens of care and protection of this guideline is to protect the reporter.

Compliance and Enforcement

Non-compliance with this guideline, including retaliation against whistleblowers, will be met with disciplinary action, which may include termination of employment or association with HOPE International Development Agency

Review and Revision

Policies are reviewed every 3-years or within 3-months following relevant regulatory changes and organizational changes, formalized concerns raised to either the Executive Director or Board Chair, or any instances of significant non-compliance of the guideline.

Reviews are routinely conducted by any member of the Senior Team, or by any Board Director following a request for review by the Board Chair.

HOPE utilizes various resources during routine reviews, including but not limited to the following:

- the PSEAH Organizational Assessment Tool produced by DIGNA <https://digna.ca/psea-organizational-assessment-tool/>

- [UNODC Resource Guide on Good Practices in the Protection of Reporting Persons](#)
- [IUCN Whistleblowing and Anti-retaliation Policy](#)
- [U.S. Equal Employment Opportunity Commission's Enforcement Guidance on Retaliation and Related Issues](#)

Date of next review is: 28 Feb, 2027

References

- HOPE's Code of Conduct
- HOPE's Safeguarding and Protection Against Sexual Exploitation, Abuse, and Harassment Policy
- CHS Alliance's Harmonised Data Collection and Reporting Scheme
- Canadian Anti-Fraud Centre guidelines
- Personal Information Protection and Electronic Documents Act (PIPEDA).
- Canada's Anti-Spam Legislation (CASL).
- Organization's existing policies related to data protection and online conduct.

Approval and Effective Date¹

This is an administrative and operational guideline which relates to both Canada and overseas operations.

Approver of this guideline: Executive Director / Director of Overseas Programs

Name of Approver: Jon McKenzie / Sean Burke

Date of Approval: 28 Feb, 2024

¹ The Executive Director and the Director for Overseas Programs are the approvers for administrative and operational policies, including subsidiary financial policies, which relate to Canada-based and Overseas operations, respectively, with the exception of top-level² financial policies. The Board of Directors can be invited to provide input on all of the above policies and is the approver for all top-level financial policies, as well as all personnel³ policies.

² The top-level financial policies are those which set the overarching principles for organizational financial management, including Financial Governance, Investment, Capital Expenditure, and Risk Management. Subsidiary financial policies are those related to day-to-day operations, including Budgeting and Forecasting, Reimbursement, Procurement as well as Financial Controls.

³ Personnel policies are those governing the employer-employee relationship, including Equal Employment, Anti-Discrimination and Harassment, Code of Conduct, Conditions of Employment including Benefits and Compensation, as well as Workplace safety. These policies collectively contribute to a consistent, ethical, and legally compliant work environment.

Annex One – Reporting Channels

A. HOPE Offices

International:

Online Reporting Form: Anonymous (optional) and available in all HOPE partner languages (Amharic, Arabic, French, Haitian Creol , Khmer, Lingala, Nepali, Sinhala, Spanish, Tagalog (Filipino), Urdu)

<http://www.hope-international.com/complaints>

Head office – Canada / Vancouver

HOPE Canada | Executive Director (interim) | Jon McKenzie

HOPE Canada | Director for Overseas Programs | Sean Burke

Toll Free phone: 1 866 525 4673 – ext. 132 (Jon) or 122 (Sean)

jonm@hope-international.com / seanb@hope-international.com

*French and Spanish speakers are also available

Africa

HOPE | Africa Director | Tibebu Bekele | +251 92 324 2541 (Cell / WhatsApp | Amharic or English) | tibebub@hope-international.com

Ethiopia – Arba Minch / Sawla

HOPE Ethiopia | Safeguarding Officer | Lidiya Sirak | +251 94 108 2926 (Cell / WhatsApp | Amharic) | SafeGuard.Ethiopia@hope-international.com

Japan

HOPE Japan | Executive Director | Jeffrey Behr | jeff@hope.or.jp

Myanmar

HOPE Myanmar | Director for Overseas Programs | Sean Burke | Toll Free phone: 1 866 525 4673 – ext. 122 | seanb@hope-international.com

New Zealand

HOPE New Zealand | Board Member | Andrew Brown | Hope NZ, PO Box 10024, Terrace End, 4441, Palmerston North, New Zealand

United Kingdom

HOPE UK | Designated Safeguarding Lead | Chris Haywood | safeguardinglead@hope-international.org.uk

United States of America

HOPE USA | President | Cliff Dick | clifferdd@hopeusa.org

B. Implementing Partners

Cambodia – Pursat Province / Veal Veng District

HOPE Development Cambodia | Country Director | (Ly) Kim Phealy | (855) 012 932 479 | phealyk01@gmail.com | (English / Khmer)

DR Congo – Gemena / North Ubangi / South Ubangi / Mongala / Bas Uele

CEUM (Congo Covenant Church) | President | Duale LANGBA THEOPHILE | dlangbatheo@gmail.com (Lingala / French)

DR Congo – Kananga / Tshikaji / Tshimbundu / Kasai-Central

Butoke | Executive Director | Dr. Jean Lumbala | (243) 974-612-732 | lumbaladrjean@gmail.com | (French)

Dominican Republic – San Jose de Ocoa

Asociación para el Desarrollo de San José de Ocoa (ADESJO) | Director (interim) | Milquelis Encarnación | +1 (809) 964-2024 | milmaren@gmail.com | (Spanish)

Dominican Republic

Instituto Para el Desarrollo del Noroeste (INDENOR) | Executive Director | Yaquelin Almonte | indenorejecutivo@gmail.com | (1) 829-961-4430 (Spanish)

Ethiopia – Addis Ababa / AkakiKaliti / Nifas Silk Lafto / Key Afer

Save Lives Ethiopia | Executive Director | Wondwossen Eshete | (251) 713 292 315 | savelivesethio@gmail.com | (Amharic or English)

Guatemala – Quiché

Asociación Unidos Por La Vida (ASUVI) | President | Jorge Luis Castro León | (502) 5083-6286 | asuviquiche@gmail.com | (Spanish)

Haiti – Duchity / Fond Baptiste

Productive Cooperatives Haiti | Finance / Operations Director | Veniel Jean | (509) 3703-4788 | finance@fida-pch.org | (English / French / Creolé)

Productive Cooperatives Haiti | National Director | Betsy Wall | (519) 588-7967 |

betsy.wall@fida-pch.org | (English / French / Creolé)

Haiti

Hospital Albert Schweitzer | CEO | Jean Marc de Matteis | (412) 361-5200

Honduras – Santa Bárbara / Comayagua / Intibucá / La Paz

Proyecto Aldea Global | Executive Director | Chet Thomas | (504) 9990-6016 | chet@paghonduras.org | (English / Spanish)

India – Raichur District

Myrada | Executive Director | Arvind Risbud | (91) 9449083166 | arvindrisbud@yahoo.com | (English / Hindi)

Nepal – Sindhupalchowk / Nuwakot Districts

Women for Peace and Democracy Nepal | Executive Director | Shobha Shrestha | (977) 1-402-4099 | shobha.shrestha@wpdnepal.org.np | (English / Nepali)

Pakistan – Sargodha

Taangh Wasaib Organization | Executive Director | Azeem Khan | (92) 336-699-7923 | executivedirector.two@gmail.com | (English / Urdu)

Pakistan

Poverty Eradication Initiative | Executive Director | Shahid Yusaf | (92) 51-237-5131 | smyusaf1@peipk.com | (English / Urdu)

Philippines – Luzon / Visayas /

Assisi Development Foundation | Executive Director | Benjamin Abadiano | (63) 918-807-8038 | benjie_abadiano@yahoo.com | (English / Tagalog)

Philippines – Davao / Mindanao

Pamulaan Center for Indigenous Peoples Education | Executive Director | Dale Perez | (63) 930-659-5865 | daleperez0626@gmail.com | (English / Tagalog)

Rwanda – Kibungo

Link Ministries | Directors | Nicholas and Elsie Hitimana | (250) 788-305-593 | enhitimana@yahoo.co.uk | (English / French)

South Sudan – Ibba

Anglican Church of South Sudan - Ibba Diocese | Director / Bishop | Bishop Kamani Wilson | (249) 913-193-712 | bishopkamani@gmail.com | (English / Arabic)

Sri Lanka - Hambontota

Sri Lanka Center for Development Facilitation (SLCDF) | Executive Director | (Wije) T.L. Wijetunga | (94) 77-293-3071 | slcdf@slt.lk | (English / Sinhala / Tamil)