

WHISTLEBLOWING POLICY

1. About this policy

We are committed to conducting our business with honesty and integrity, and we expect all staff to maintain high standards of behaviour and performance. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

The aims of this policy are:

- (a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate and their confidentiality will be respected.
- (b) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This policy covers all employees, officers, consultants, contractors, volunteers, interns, casual workers and agency workers.

2. Application

This Policy applies to all ISRD employees, independent of their location, grade, type or duration of appointment, and including Temporary Appointment holders, notwithstanding their contractual or remuneration status: i.e. individuals who have a contractual relationship with ISRD, such as temporary advisers, Special Service Agreement holders, consultants and interns, as well as third party entities such as vendors, contractors or technical partners. Unless otherwise specified in the policy.

3. Zero Tolerance

ISRD adopted a zero-tolerance policy to any form of retaliation against a person who either reports reasonably held suspicions of a breach of the organisation's Internal Rules or who cooperates in an audit or investigation process carried out under the authority of the Secretary. In furtherance of this zero-tolerance policy, the Secretary and President is committed to ensuring:

- compliance with the Federation's rules, regulations, policies and procedures by establishing controls intended to prevent and deter their violation;
- > that the organisation benefits from prompt notification of a possible breach of the organisation's Internal Rules ("alleged misconduct") so that appropriate action can be taken in the best interests of the organization and
- the protection of any person in the service of the organisation against retaliation for reporting a suspicion of alleged misconduct or for cooperating in an authorized audit or investigation process.

4. WHAT IS WHISTLEBLOWING?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. Common examples of this type of behaviour are set out in Appendix 1. A **whistleblower** is a person who raises a genuine concern relating to any of the above.

5. RAISING A WHISTLEBLOWING CONCERN

Initially, concerns should be raised with your line manager, in person or in writing but if this is difficult or inappropriate – for example if your line manager might be involved, you may refer the matter to:

- (a) President of ISRD (isrd imphal@yahoo.co.in).
- (b) Secretary of ISRD (office@isrdmanipur.org)

We will arrange a meeting or telephone call with you as soon as possible to discuss your concern. You may bring a colleague or trade union representative to any meetings but all parties must respect the confidentiality of the investigation.

If you need to raise your concern confidentially, we will make every effort to keep your identity secret.

6. INVESTIGATION AND OUTCOME

Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. We may then proceed to an investigation and we will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

7. **IF YOU ARE NOT SATISFIED**

While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. If you are dissatisfied with the outcome, you can raise to following persons.

SI. No.	Name	Designation	Telephone No.	Email
1	Ms Heigrujam Loidang Devi	Secretary	+91 7005107722	office@isrdmanipur.org
2.	Mr. Ksh. Dinesh Singh	Director	+91 9612569116	isrdimphal@gmail.com
3.	Ms M. Gomita Devi	Treasurer	+91 9862623340	Isrd_imphal@yahoo.co.in

8. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken. Whistleblowers must not suffer any detrimental treatment as a result of raising a concern, including dismissal, disciplinary action, threats or other unfavourable treatment. If you believe that you have

suffered any such treatment, you should inform the President of ISRD (isrd_imphal@yahoo.co.in) or Secretary of ISRD (office@isrdmanipur.org) immediately.

Anyone who threatens or seeks to retaliate against whistleblowers in any way may be subject to disciplinary action.

9. Confidentiality and Anonymity

Reports of a suspicion of alleged misconduct will be kept confidential to the maximum extent possible, consistent with the need to conduct a proper review and, if determined, an investigation. In situations whereby the whistleblower is needed to provide evidence, his/her identity shall be revealed only with his/her consent or if required by law.

APPENDIX 1

Common types of behaviour which might be the subject of whistleblowing:

- (a) criminal activity;
- (b) failure to comply with any legal or professional obligation or regulatory requirements;
- (c) (c) miscarriages of justice;
- (d) danger to health and safety;
- (e) damage to the environment;
- (f) bribery [under our <u>Anti-corruption and Bribery Policy</u>];
- (g) financial fraud or mismanagement;
- (h) breach of our internal policies and procedures;
- (i) conduct likely to damage our reputation or financial wellbeing;
- (j) unauthorised disclosure of confidential information;
- (k) negligence;
- (l) the deliberate concealment of any of the above matters.