



# **WHISTLEBLOWING POLICY AND PROCEDURES**

**TABLE OF CONTENTS**

- 1. POLICY INTRODUCTION..... 4**
- A PURPOSE..... 4**
- 1.2 DEFINITION OF WHISTLEBLOWING ..... 4**
- 1.2.1 WHISTLEBLOWER AT CIVICUS..... 5**
- 1.3 LEGAL FRAMEWORK SCOPE ..... 6**
- 1.3.4 DATA PROTECTION AND CONFIDENTIALITY ..... 8**
- 1.4 GUIDING PRINCIPLES ..... 8**
- 1.5 ROLES & RESPONSIBILITIES ..... 9**
- 1.6 WHISTLEBLOWING PROCEDURES ..... 10**
- 1.7 INVESTIGATION PROCESS..... 12**
- 1.8 INVESTIGATION ..... 13**
- 1.8iii INVESTIGATION TRIAGE AND THRESHOLD DECISIONS..... 13**
- 1.9 REPORTING METHODS..... 16**
- 2.0 ASSOCIATED POLICIES IN CIVICUS'S WHISTLEBLOWING POLICY AND PROCEDURES.. 19**

This document outlines the policies and procedures governing the procedures and guidelines for whistleblowing within CIVICUS, aiming to promote a culture of transparency, accountability, and ethical conduct across the organisation. It provides a structured mechanism for all stakeholders, including employees, volunteers, members, and partners, to report suspected or actual instances of misconduct, illegal activities, or breaches of organisational policies.

The objective is to ensure that everyone associated with CIVICUS feels empowered and protected when raising concerns about wrongdoing, with the assurance that these concerns will be handled confidentially and professionally, and without fear of retaliation. The policy supports the organisation's commitment to uphold CIVICUS's core values of Accountability, Diversity, Inclusion, Global Solidarity, and System Change, ensuring that all activities and operations are conducted in a responsible and ethical manner.

## **1. POLICY INTRODUCTION**

At CIVICUS, our core values - Accountability, Diversity, Inclusion, Global Solidarity, and System Change shape our work and mission. These values lead us to recognize the importance of having a strong Whistleblowing Policy and Procedures in place.

Our commitment to these values extends to upholding a unified code of ethics that guides our actions and decisions. It is within this principled framework that we emphasize the need for a robust Whistleblowing Policy and Procedures. This policy is designed to promote a culture that encourages the responsible disclosure of information related to criminal conduct, violations of CIVICUS Policies, Staff Handbook, or irregular workplace behaviour. Additionally, it provides safeguards against reprisals or discrimination, underpinning our commitment to protecting the organization's integrity and values. In essence, the Whistleblowing Policy and Procedures are an integral part of CIVICUS's commitment to living the values and maintaining the highest ethical standards.

### **1.1 PURPOSE**

At CIVICUS, we are dedicated to embedding a culture of transparency, accountability, and ethical conduct. This Whistleblowing Policy and Procedures document outlines our commitment to ensuring that all staff members, regardless of their location, have the means to raise genuine concerns about irregular or illegal conduct within our organization. The primary objectives of this policy are:

- 1.1i To encourage CIVICUS staff to disclose information related to criminal conduct, violations of CIVICUS policies, the Staff Handbook, regulatory procedures, or any other irregular conduct in the workplace responsibly.
- 1.1ii To provide clear guidelines for making such disclosures and to ensure protection against any reprisals because of these disclosures.

### **1.2 DEFINITION OF WHISTLEBLOWING**

- 1.2i Whistleblowing, also known as employee protection, is the courageous act of reporting actual instances of wrongdoing within CIVICUS. This could include cases where someone observes criminal activities taking place, breaches of the organization's policies, violations of the Staff Handbook, or the flouting of regulatory procedures within the workplace or during CIVICUS operations.
- 1.2ii For instance, if a CIVICUS employee becomes aware of financial misconduct, discrimination, harassment, or any other behaviour that goes against our core values, they have a duty to report it. Importantly, whistleblowers should feel secure in their actions, knowing that CIVICUS is committed to shielding them from any form of retaliation or harm because of their disclosure.

## 1.2.1 WHISTLEBLOWER AT CIVICUS

The whistleblower policy & procedures encompasses, but not limited to the following:

- 1.2.1i **CIVICUS Staff:** All employees, regardless of their position or department, have the right and responsibility to blow the whistle if they witness or suspect wrongdoing within our organization.
- 1.2.1ii **Volunteers/Interns/associates:** Those who generously volunteer their time and skills to support CIVICUS's mission are also encouraged to report concerns they may encounter during their volunteering tenure.
- 1.2.1iii **General Public:** We welcome and value information from members of the public, communities, and the wider civil society network who may come across actions or behaviour that raise concerns about inappropriate activities.
- 1.2.1iv **CIVICUS Members:** Our members, who share our commitment to civil society strengthening, are an integral part of our mission. They too can play a role in whistleblowing if they become aware of any activities that go against our shared values and principles.
- 1.2.1v **Vendors and Partners:** We recognize the importance of accountability in all our partnerships. Vendors, partners, and collaborators who work with us are encouraged to report any irregularities or misconduct they encounter during their interactions with CIVICUS.

### 1.2.1vi **Guidance on What Classifies as a Protected Disclosure**

To ensure clarity and promote a uniform understanding amongst all stakeholders, this section delineates what constitutes a protected disclosure within CIVICUS. A protected disclosure involves any report of actions or behaviour that is either unlawful or contravenes the established policies and ethical standards of CIVICUS. This encompasses, but is not limited to, the following:

- a **Financial Misconduct:** Any act of manipulating financial records or improper utilisation of funds.
- b **Discrimination:** Behaviours or policies that violate our commitment to equality and non-discrimination.
- c **Harassment:** Conduct that contributes to a hostile work environment, including, but not limited to, unwanted comments, gestures, or physical contact.
- d **Other Unlawful Acts or Breaches of Organisational Policy:** Any actions that infringe upon laws or the ethical guidelines upheld by CIVICUS.
- e **Legal Framework Supporting Protected Disclosures**  
As stipulated in our legal framework, "The Protected Disclosures Act 26 of 2000 supports whistleblowers by legally protecting those who report wrongdoing. This aligns well with

CIVICUS' core value of accountability and accomplishes this by legally safeguarding individuals who make good faith disclosures." This act is fundamental in ensuring that our whistleblowing procedures adhere to statutory protections and ethical obligations.

f **Best Practices for Making a Protected Disclosure**

When making a disclosure, it is imperative that the following standards are met to ensure the integrity and effectiveness of the communication:

g **Clarity and Conciseness:** Disclosures should be sufficiently detailed to provide a clear understanding of the issues, without unnecessary complexity.

h **Professional and Respectful Language:** The tone of the disclosure should be professional and constructive. It is important to avoid threatening language, threats, and demands as "such language is not helpful and can undermine the credibility of the complaint."

**Examples of Protected Disclosures:**

**Financial Misconduct:** Reporting instances where financial records have been altered or funds misappropriated.

**Discrimination:** Disclosing violations of organisational policies that ensure equality, such as unequal treatment based on gender, race, or other protected characteristics.

**Harassment:** Reporting behaviour that undermines an individual's dignity at work, including sexual harassment or bullying.

This guidance is designed to assist all members of the CIVICUS community in recognising their rights and responsibilities concerning whistleblowing and encourages responsible and protected disclosures.

Everyone, whether an internal stakeholder or an external partner, has a role to play in ensuring that the organisation upholds its core values and ethical standards. If you see something that does not align with our principles, we encourage you to speak up. Your voice matters.

## 1.3 LEGAL FRAMEWORK SCOPE

### 1.3.1 The Protected Disclosures Act 26 of 2000 (South Africa)

- 1.3.1i Our Whistleblowing Policy and Procedures are rooted in the South African legal framework known as the Protected Disclosures Act 26 of 2000. This Act is particularly significant in terms of a reference legislation, as CIVICUS's has its legally registered headquarters in Johannesburg, South Africa.
- 1.3.1ii The Protected Disclosures Act 26 of 2000 helps Whistleblowers by legally protecting those who report wrongdoing. This aligns well with CIVICUS' core values of accountability and

transparency. It accomplishes this by legally safeguarding individuals who make good faith disclosures.

- 1.3.1iii This Act serves as enabler for staff to report wrongdoing without fear of retaliation, ensuring that ethical conduct and integrity remain fundamental principles within CIVICUS.

### **1.3.2 Compliance with Local Legislation**

CIVICUS operates in diverse geographical locations worldwide, with staff distributed around the world and hubs connecting with key United Nations bodies in New York and Geneva. This involves compliance with various jurisdictions, as locations may have specific legislation related to whistleblowing and workplace misconduct. Entities operating within these locations are obligated to adhere to the relevant local and national laws and regulations. Ensuring that CIVICUS' whistleblowing policies and procedures align with these legal requirements is of paramount importance.

### **1.3.3 Legal and Employment Law Expertise**

- a To guarantee compliance with local laws, CIVICUS engages legal counsel or employment law experts in each jurisdiction where it operates. These experts provide invaluable guidance on tailoring the whistleblowing policies and procedures to meet local legal standards. Their expertise ensures that CIVICUS remains in full adherence to the laws and regulations of each specific region.
- b CIVICUS recognises the critical importance of legal and employment law expertise in the effective implementation and ongoing management of its whistleblowing framework. To ensure compliance with both local and international legal standards, we have committed to engaging legal and employment law experts on an ongoing basis, not merely at the time of a complaint. This approach supports our dedication to maintaining the highest standards of legal and ethical conduct across all jurisdictions in which we operate.

### **Continuous Legal Engagement**

- c **Role of Experts:**  
Our legal and employment law experts are integral to the development and refinement of our whistleblowing policies and procedures. They provide invaluable guidance to ensure that our practices are not only compliant with current laws but also reflect the latest legal developments and best practices in whistleblowing and employment law. Their continuous involvement ensures that *“CIVICUS remains in full adherence to the laws and regulations of each specific region.”* (CIVICUS Whistleblowing Policy, Section 1.3.3)
- d **Regular Reviews:**  
To maintain the relevance and effectiveness of our whistleblowing framework, legal experts are involved in regular reviews of our policies. These reviews are crucial for adapting our practices to evolving legal standards and ensuring that our procedures remain robust against both current and emerging challenges.
- e **Training and Development:**  
Furthermore, these experts contribute significantly to the training programmes for staff and management. Such training ensures that all personnel are well-informed of their rights and

responsibilities under the policy, fostering a culture of awareness and compliance throughout the organisation.

**f Enhancing Policy Implementation**

By maintaining continuous engagement with specialised legal counsel, CIVICUS ensures that any changes in the legal landscape are swiftly identified and seamlessly integrated into our policy framework. This proactive approach not only helps in preventing legal oversights but also enhances the organisation's capacity to respond effectively and ethically to whistleblowing incidents.

### **1.3.4 DATA PROTECTION AND CONFIDENTIALITY**

**1.3.4i Protection of Personal Information Act, 2013 (POPIA) - South Africa**

In South Africa, where CIVICUS global HQ is located, the Protection of Personal Information Act, 2013 (POPIA) is relevant and applicable. This legislation governs how organizations collect, use, store, delete, and otherwise handle personal information. It plays a critical role in safeguarding the confidentiality rights of whistleblowers (alongside PDA, 2000). CIVICUS is committed to adhering to POPIA's provisions to ensure that whistleblower information remains confidential and protected.

**1.3.4ii General Data Protection Regulation (GDPR) - European Union (EU)**

In EU jurisdictions, CIVICUS is committed to the principles of the General Data Protection Regulation (GDPR). GDPR mandates that all personal data, whether that of the whistleblower or any accused individuals, must be handled in strict accordance with its provisions. CIVICUS ensures that GDPR is followed diligently, where applicable, to protect the privacy and data rights of all stakeholders involved in whistleblowing reports.

## **1.4 GUIDING PRINCIPLES**

Our Whistleblowing Policy is underpinned by guiding principles; these principles are aligned to the CIVICUS core values:

**1.4.i Anonymity & Confidentiality:**

Employees are encouraged to express their concerns anonymously, recognizing that anonymity can sometimes hinder investigations but prioritizing the safety of whistleblowers in alignment with our core value of Inclusion.

**1.4.ii Good Faith:**

We expect employees to act in good faith when reporting concerns, they believe to be true. However, we reserve the right to take disciplinary action against those who make unfounded allegations maliciously or knowingly provide false information, this aligns to the values of promoting Accountability and Integrity within our organization.



- 1.4.iii **Protection for CIVICUS Staff:**  
CIVICUS is dedicated to safeguarding those who raise concerns in accordance with these procedures from any form of victimization, whether from colleagues, management, senior management, board, or any other member entity representing the employer.
- 1.4.iv Employees who follow the Whistleblowing procedure or make disclosures in accordance with the Protected Disclosures Act will not face disciplinary action, provided their actions are in good faith. However, disciplinary action may be taken against those who misuse the procedure by raising unfounded false concerns or acting in bad faith.
- 1.4.v **Duty of Care and Support for Individuals Subject to a Complaint**  
CIVICUS commits to a comprehensive duty of care for all individuals implicated in a whistleblowing complaint, whether they are the subject of the complaint or are participating in the investigation. This commitment ensures the provision of necessary support services to help manage the stress and potential repercussions of being involved in such procedures.
- 1.4.vi **Access to Support Services:**  
Recognising the emotional and professional challenges faced by individuals subject to a complaint, CIVICUS provides access to confidential counselling and support services through our Employee Assistance Program (EAP), delivered in partnership with ICAS South Africa. These services are designed to offer psychological support, legal advice, and career guidance to ensure the well-being of all parties involved.
- 1.4.vii **Proactive Communication:**  
Regular updates and clear communication will be maintained with the individuals involved, ensuring they are informed about the progress of the investigation and any actions they may need to undertake. This transparency helps in reducing uncertainty and stress during the investigatory process.
- 1.4.viii **Confidentiality Assurance:**  
The confidentiality of those accessing support services will be strictly upheld, in accordance with both our organisational policies and legal standards. This assurance is critical in encouraging individuals to seek help without fear of stigma or retaliation.

## 1.5 ROLES & RESPONSIBILITIES

To ensure the effective deployment of our Whistleblowing Policy, specific roles and responsibilities have been assigned as follows:

- All Staff and Volunteers shall be responsible for:**
- 1.5.1a Reporting any Whistleblowing Concerns they may have in accordance with the reporting procedures outlined in this policy, subject to any amendments made by CIVICUS at its discretion. Assisting in any investigations of Whistleblowing Concerns by providing all relevant information and cooperating in interviews.

**Line Managers / Team Leads are responsible for:**

- 1.5.2a Ensuring that the principles of this policy are effectively communicated and understood throughout their respective teams. Promptly escalating any reports of Whistleblowing Concerns they may receive to the appropriate Policy Administrator.

**The Policy Administrators (or their designees, excluding cases where they serve as Policy Administrators) shall be responsible for:**

- 1.5.3a Providing training, advice, guidance, and continuous support to Line Managers / Team Leaders on the implementation and application of the Whistleblowing Policy.
- 1.5.3b Determining the scope, if any, of investigations regarding Whistleblowing Concerns raised under this policy. They will also decide who should conduct the investigation and ensure that any subsequent investigation is managed efficiently and promptly.
- 1.5.3c Facilitating the implementation of appropriate responses to recommendations made in Whistleblowing investigation reports by management.
- 1.5.3d Compiling an annual summary report of reported Whistleblowing & Safeguarding Concerns for presentation to the International Board.
- 1.5.3e Ensuring the strict confidentiality and secure retention of all records related to reported Whistleblowing Concerns and Whistleblowing investigations, in accordance with the required retention periods specified under the POPI or GDPR Act, as applicable, and as outlined in the Retention, Storage, and Destruction of Key Documents Policy.
- 1.5.3f The SG (Secretary-General) is responsible for ensuring the effective implementation and ongoing monitoring of the Whistleblowing Policy.
- 1.5.3g The International Board of CIVICUS holds the responsibility for overseeing management's implementation of, and adherence to, the Whistleblowing Policy.

## **1.6 WHISTLEBLOWING PROCEDURES**

### **REPORTING A CONCERN**

#### **Anonymous Disclosures through Third-party Independent Reporting Entity\***

- 1.6i CIVICUS recognizes the importance of providing a secure and confidential channel for whistleblowers to report concerns without revealing their identity. Anonymous reporting is a valuable means to encourage individuals to come forward with information regarding suspected malpractice, unethical conduct, or illegal practices within the organization. Research has evidenced that more than half of all whistleblowers make use of internet-based reporting channels (ACFE: Report to nations 2016)

- 1.6ii **Anonymous Reporting Channel:**  
CIVICUS provides a dedicated channel for anonymous reporting through a Third-party Independent Reporting Entity within the Whistleblowing Policy and Procedures. This third-party entity ensures that whistleblowers can submit their reports digitally, without disclosing their identity. This could be in the form of an online portal or a dedicated phone line, ensuring that their personal attributes such as working department, IP address, telephone number, voice, or writing style cannot be used to identify them. The reporting can be multilingual, accessible, and available in over 100 languages,
- 1.6iii **Secure and Encrypted Communication:**  
To safeguard the anonymity of whistleblowers, CIVICUS and its Third-party Independent Reporting Entity employ stringent security measures. All data transmitted during the anonymous reporting process is encrypted to protect the whistleblower's identity.
- 1.6iv **Anonymous Communication:**  
Whistleblowers are encouraged to communicate anonymously throughout the reporting process. They may use pseudonyms or unique identifiers instead of personal information when interacting with the Third-party Independent Reporting Entity.
- 1.6v **Whistleblower Education:**  
CIVICUS provides clear instructions and guidance to whistleblowers on how to maintain their anonymity when using the reporting interface provided by the Third-party Independent Reporting Entity. It is crucial that whistleblowers do not disclose personally identifiable information in their reports to preserve their confidentiality.
- 1.6vi **Data Protection:**  
CIVICUS and its Third-party Independent Reporting Entity ensure robust data protection measures are in place within the anonymous reporting process. This includes secure storage of report data and limited access restricted to authorized personnel only (POPIA, GDPR where applicable)
- 1.6vii **Whistleblower Protection:**  
CIVICUS emphasizes its commitment to protecting whistleblowers, even when reports are anonymous. Whistleblowers are assured that they will be shielded from retaliation or adverse actions for making anonymous reporting.
- 1.6viii **Investigation and Follow-up:**  
While maintaining the whistleblower's anonymity, CIVICUS and its Third-party Independent Reporting Entity have established a process to review and investigate anonymous reports. If necessary, the Third-party Independent Reporting Entity may communicate with the whistleblower through the anonymous channel to gather additional information.
- 1.6ix **Reporting Mechanism Feedback:**  
CIVICUS and its Third-party Independent Reporting Entity are committed to providing feedback to whistleblowers on the status and outcome of their anonymous reports, all while preserving their anonymity.

- 1.6x **Legal Compliance:**  
The anonymous reporting process through the Third-party Independent Reporting Entity complies with all relevant data privacy and whistleblower protection laws in the jurisdictions where CIVICUS operates.
- 1.6xi **Continuous Improvement:**  
CIVICUS and its Third-party Independent Reporting Entity regularly review and enhance the anonymous reporting process based on feedback and emerging best practices to ensure it remains a trusted and effective mechanism for reporting concerns while maintaining whistleblower anonymity.
- 1.6xii **External Disclosures**  
CIVICUS’s Whistleblowing Policy is primarily designed to create an internal framework for reporting, investigating, and addressing Whistleblowing Concerns. However, it is crucial to emphasize that this policy does not restrict the right of CIVICUS Staff and Volunteers to report such concerns to external entities, like regulatory authorities, if they genuinely believe this is the most appropriate course of action.

## 1.7 INVESTIGATION PROCESS

To uphold the integrity of our investigative processes and ensure that all concerns are addressed transparently and thoroughly, CIVICUS adheres to a structured approach for investigating disclosures. This includes both internal and external mechanisms to handle reports, particularly in scenarios that involve significant conflicts of interest.

- 1.7i **Initial Assessment:**  
*“The designated Policy Administrator(s) will conduct an initial assessment to determine whether the reported Whistleblowing Concern warrants an investigation.”* This step is crucial to ascertain the validity and severity of the report and decide the appropriate investigative approach.
- 1.7ii **Assignment of Investigative Team:**  
Depending on the nature and severity of the report, an investigative team consisting of internal audit, compliance, or HR professionals may be assigned. This team is responsible for gathering facts, interviewing witnesses, and documenting findings to ensure a comprehensive understanding of the issue.
- 1.7iii **Confidential Handling:**  
*“Ensuring the strict confidentiality and secure retention of all records related to reported Whistleblowing Concerns and Whistleblowing investigations”* is paramount to protect the parties involved and maintain the integrity of the process.
- 1.7iv **External Investigation Process:**  
In cases where internal resources are deemed insufficient or there is a potential conflict of interest, external legal counsel or independent investigators may be engaged. This ensures impartiality and expertise in handling complex issues. Furthermore, *“CIVICUS provides a*

*dedicated channel for anonymous reporting through a Third-party Independent Reporting Entity within the Whistleblowing Policy and Procedures.” This allows whistleblowers to bypass internal channels if they prefer.*

**1.7v Oversight by External Authorities:**

For issues involving significant legal implications or severe breaches, the matter may be escalated to external authorities, such as regulatory bodies or law enforcement, as per legal requirements and organizational policies.

**1.7vi Conflict of Interest:**

At every stage of the investigation, checks for conflicts of interest are conducted. If a conflict is identified, the matter is immediately redirected to alternative investigators or external parties to ensure fairness and integrity of the investigative process.

**1.7vii Feedback Incorporation and Continuous Improvement:**

Recognizing the importance of stakeholder feedback in refining investigative processes, feedback from all relevant stakeholders is solicited post-investigation. This feedback is used to systematically review and enhance the investigation protocols and procedures. Adjustments may include improvements to investigative techniques, communication methods, or procedural timelines, ensuring the processes remain effective and aligned with best practices.

## **1.8 INVESTIGATION**

1.8i Once the decision to investigate a reported Whistleblowing Concern is made, the designated officer or Administrator, guided by the triage and threshold guidelines, may assign the responsibility to one or more suitable members of staff or an approved internal investigator, including those not employed by CIVICUS.

1.8ii However, in cases involving the Secretary-General (SG) or an International Board member, when the Policy Administrator determines that an investigation is necessary based on the triage and threshold assessment, an external investigator, reporting to the appropriate Designated Officer / Policy Administrator, should generally be engaged.

### **1.8iii INVESTIGATION TRIAGE AND THRESHOLD DECISIONS**

**1.8iiia Investigation Triage and Threshold Decisions**

CIVICUS employs a robust triage mechanism within the whistleblowing investigation process to ensure that each concern is addressed promptly and appropriately based on its severity and potential impact. This mechanism aids in prioritizing issues, efficiently allocating resources, and ensuring timely responses.

## 1.8iiib **Definitions of Priority Levels**

### a **High Priority Issues:**

"High priority concerns include activities that may have a significant legal or regulatory impact, pose serious financial risks, or involve senior management in ethical breaches." Immediate investigations are initiated, involving senior management or external experts if necessary. A preliminary report is to be submitted within 48 hours of the concern being raised.

### b **Medium Priority Issues:**

"Medium priority concerns include issues that violate internal policies or ethical standards but may not necessarily have immediate legal consequences." Comprehensive investigations to be completed within two weeks, with relevant department heads involved to ensure timely corrective measures.

### c **Low Priority Issues:**

"Low priority concerns generally involve minor policy infringements or complaints which do not significantly impact the organisation but require correction to prevent escalation." Issues are reviewed and resolved at the departmental level, with a summary report filed to the Policy Administrator at the end of each month.

### d **Secondary Risk Assessment in Whistleblowing Procedures**

The CIVICUS Whistleblowing Policy integrates a secondary risk assessment using the risk assessment matrix outlined in the *CIVICUS Risk and Assurance Policy*. This matrix serves as a critical tool for refining triage and threshold decisions, ensuring that organizational perspectives on risk are thoroughly considered.

### e **Application of the Risk Assessment Matrix**

After initial triage categorizes whistleblowing reports based on their immediate severity and impact, the risk assessment matrix is applied as a secondary layer of analysis. This matrix evaluates the risks from an organizational perspective, assessing both the likelihood and the potential severity of outcomes, which includes reputational damage, legal implications, and financial impact.

### f **Matrix Utilization:**

"The risk matrix categorizes risks into four quadrants, assessing them based on the likelihood of occurrence and the potential impact. This helps in identifying which risks require immediate attention and which may be managed with standard monitoring procedures." This methodical approach ensures that each whistleblowing case is evaluated comprehensively, allowing for informed decision-making regarding further investigative needs and resource allocation.

### g **Enhanced Triage and Threshold Decisions**

Using this matrix, whistleblowing cases that initially appear of lower severity might be escalated based on their potential to affect organizational integrity significantly:

- h **High Impact, Low Frequency Risks:**  
Even if a whistleblowing report initially seems to have a low immediate impact, the matrix may reveal significant long-term or strategic risks to CIVICUS, prompting more intensive investigation.
- i **Low Impact, High Frequency Risks:**  
Conversely, frequent minor issues highlighted by the matrix can indicate systemic problems, requiring policy revisions or broader organizational changes.
- j **Documenting:**  
All findings from the secondary risk assessment are meticulously documented, providing a clear audit trail that supports the rationale for subsequent actions.
- k **Reporting:**  
Enhanced reporting mechanisms ensure that the Governance, Risk & Compliance Committee, and other relevant stakeholders are fully informed of the outcomes and can oversee the implementation of necessary interventions.
- l **Continuous Improvement and Feedback Integration**  
This secondary risk assessment process is subject to ongoing review and refinement, incorporating feedback from whistleblowing cases to enhance the accuracy and effectiveness of the risk matrix over time.

#### TRIAGE PROCESS

- 1.8iiic **Initial Assessment:**  
"Each report received through the whistleblowing channel is logged and assessed for its nature and urgency by the Policy Administrator." This ensures that each case is appropriately categorized and managed according to its urgency and significance.
- 1.8iiid **Escalation and Reassignment:**  
Depending on the priority level, concerns may be escalated to higher levels of management or reassigned to specialized teams or external advisors. "Serious concerns involving criminal activities or significant ethical breaches are escalated directly to the *Ethics Committee*\* or external legal advisors."
- 1.8iiie **Threshold Determination**  
The transition of a case from internal resolution to external investigation is determined through a careful evaluation of the complexity, potential impact on CIVICUS's brand image and reputation, risks involved, and legal or ethical considerations. Typically, this decision is made by a designated committee or authority responsible for overseeing such matters.
- 1.8iiif **Monitoring and Feedback**  
Continuous monitoring of the investigation process ensures that each step is completed within the stipulated timeframes. Whistleblowers are provided with periodic updates, respecting their choice for anonymity, about the progress and outcomes of the investigation.

1.8.iiig **Additional Provisions for Whistleblowers**

Whistleblowers who choose not to remain anonymous may request to have a colleague of their choosing present at any meetings related to the Whistleblowing Concern. If applicable under local regulations, a trade union or staff committee representative may also accompany the Whistleblower. Alternative arrangements may be made if the initially proposed colleague is considered unsuitable by the Policy Administrator.

1.8.iiih **Confidentiality and Informing the Whistleblower**

When appropriate, and considering the need for confidentiality, the Whistleblower should be kept informed about the progress of the investigation. In cases where the Whistleblower remains anonymous, it is generally not feasible to provide detailed updates beyond confirming that an investigation has commenced or concluded.

1.8.iiiii **Disciplinary Actions for False Allegations**

If either the initial assessment or the investigation determines that a Whistleblower has deliberately or knowingly made false allegations, the Whistleblower may be subject to disciplinary action as per CIVICUS disciplinary proceedings, including the possibility of termination of employment.

1.8.iiij The terms "triage" and "threshold" are vital components in the investigation process. Triage involves the initial assessment and categorization of complaints, grievances, or whistleblowing cases to determine how they should be handled. The threshold represents the point at which a case moves from being resolved internally to requiring external investigation. This transition, as well as the level of staff involvement, is determined by a contextual assessment.

## 1.9 REPORTING METHODS

### Online Reporting:

1.9i Submission Method: Partners and community members are encouraged to use the secure online Whistleblower Disclosure Form to submit their concerns. Confirmation Email: Upon successful submission, an automated, time-stamped email will be generated, serving as proof of receipt.

### Offline Reporting for Partners and Community Members:

- 1.9ii Submission Method: Physical Whistleblower Disclosure Forms will be made available at designated community centers and partner locations. Anonymous Option: Individuals who wish to remain anonymous can submit their forms in a sealed envelope into a secure drop box. Access to this box will be restricted to authorized personnel. Receipt Acknowledgment: Those not requiring anonymity may hand over their forms directly to designated personnel and receive a manually dated and signed acknowledgment receipt.
- 1.9iii Anonymous Acknowledgment: For anonymous submissions via the secure drop box, each form will come with a pre-printed unique identifier. Individuals are encouraged to note this down to later verify the receipt and status of their submission.



### **Data Security:**

- 1.9iv Both online and offline submissions will be securely stored and processed in compliance with the Protection of Personal Information Act (POPIA).

### **Accountability:**

- 1.9v Acknowledgment receipts, whether time-stamped emails for online submissions or manually dated and signed receipts for offline submissions, will serve as a formal record for both the organisation and the submitting individual.

### **Integration with Existing Systems:**

- 1.9vi All reports, irrespective of the submission method, will be reviewed by the policy administrator / designated officer / personnel and will be integrated into the existing compliance and review systems.

### **Timely Response**

#### **1.9vii Timely Initiation of Investigations**

In alignment with our commitment to swift and effective handling of whistleblowing concerns, the Appointed Officer is tasked with ensuring that the initial investigation commences within five working days of receiving the report. This prompt initiation allows us to address concerns swiftly while maintaining the integrity of the investigatory process. The timeframe for initiating the investigation may be adjusted based on the complexity and specifics of each case, ensuring a thorough and fair approach to all investigations.

#### **1.9viii Feedback and Resolution of Investigations**

Upon conclusion of the investigation, feedback will be provided to the whistleblower within five working days. This feedback will detail how the matter has been addressed, outlining the steps taken and any resolutions achieved. Information pertaining to the outcomes of the investigation, with the exception of details related to any disciplinary actions which remain confidential, will be shared with the concerned individual. This ensures transparency and closure for the whistleblower while upholding the strict confidentiality required in such matters.

While setting precise time limits for investigations is challenging due to the unique nature of whistleblowing concerns, the Appointed Officer will ensure that an initial investigation commences within 5 working days of receiving the concern. This timeline will be determined based on the merit of each case.

### **Feedback and Outcomes**

- 1.9ix Within five working days of concluding the investigation, feedback regarding how the matter has been addressed will be provided. Information pertaining to the outcomes of the investigation, except for details related to disciplinary actions, will be shared with the concerned individual while maintaining strict confidentiality.

## 1.9x WHISTLEBLOWING PROCEDURES AND TIMELINES:

STAGE OF PROCESS	ACTION	TIMELINE	NOTES
<b>ACKNOWLEDGEMENT OF COMPLAINT</b>	Receipt of whistleblowing report acknowledged by the designated Policy Administrator.	Within <b>2 business days</b>	Confirmation that the concern has been received and is being taken seriously.
<b>INITIAL INVESTIGATION COMMENCEMENT</b>	The Appointed Officer ensures the initial investigation starts.	Within <b>5 working days</b>	Timeline may vary based on the complexity of the case.
<b>PRELIMINARY REPORT</b>	Provision of a preliminary report to the whistleblower and relevant authorities.	Within <b>30 days</b> of investigation commencement	Provides an update on the findings or progress of the investigation.
<b>RESOLUTION AND CLOSURE</b>	Final resolution of the whistleblowing case.	Maximum of <b>90 days</b> from the start of the investigation	Efforts are made to resolve cases within this period; exceptions and extensions are clearly communicated.
<b>FEEDBACK TO WHISTLEBLOWER</b>	Feedback provided regarding the resolution and outcome of the investigation.	Within <b>5 working days</b> of investigation conclusion	Except for disciplinary actions, details of the outcome are shared while maintaining confidentiality.

## 2.0 ASSOCIATED POLICIES IN CIVICUS'S WHISTLEBLOWING POLICY AND PROCEDURES

- 2.i **CIVICUS's Whistleblowing Policy** is aligned with several other key policies to create a cohesive framework that supports ethical conduct, accountability. This comprehensive approach ensures that whistleblowers are protected while enhancing the organization's ethical standards.
- 2.ii **CIVICUS Feedback & Consultation:** Works alongside the Whistleblowing Policy to provide another avenue for people to voice concerns, strengthening the organization's responsive mechanisms.
- 2.iii **CIVICUS Grievance Policy and Procedure:** Complements the Whistleblowing Policy by providing formal channels for complaint resolution, ensuring fairness and transparency.
- 2.iv **CIVICUS Global Staff Safety & Security Policy:** Ensures staff can report safety concerns via the whistleblowing process, contributing to a more secure work environment.
- 2.v **Code of Conduct:** Sets the behavioural standards that are upheld by the Whistleblowing Policy, particularly in relation to reporting ethical lapses or safeguarding issues.
- 2.vi **CIVICUS Occupational Health and Safety Procedures:** Supports the Whistleblowing Policy by encouraging the reporting of workplace safety hazards.
- 2.vii **CIVICUS Risk & Assurance Policy:** Helps in identifying and proactively addressing risks that whistleblowers might expose, ensuring comprehensive safeguarding.

These interconnected policies collectively contribute to the strength and effectiveness of CIVICUS's Whistleblowing Policy.