BRAC Whistleblowing Policy and Procedure

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1. Introduction

An Organization needs to maintain various channels of reporting, to ensure employees and operations are functioning as per law, its own values and policies and regulations. BRAC is committed to upholding a safe, legal, and policy complaint workplace, for all its employees and program participants. BRAC strives for integrity, which means it creates a transparent and accountable work environment, where people feel safe when, reporting potential, or witnessed, or experienced breaches of values, policies, standards and procedures to the Organization.

BRAC, for over forty years, has given paramount importance to the safety of the participants of its programs, the safety of the employees of its programs, and the safety of the employees of its enterprises, in the way it has conducted its (anti-poverty) work.

The whistleblowing policy goes beyond safeguarding- it is about all policies dealing with financial integrity, anti-corruption, and as well as physical safety within BRAC programs.

Specifically to safeguarding, BRAC has safeguarded its people (program participants, employees) in the first place, by making their safety a primary consideration already, at the level of the design of programs and enterprises. The prevention of sexual harassment, intimidation, violence, bullying, humiliation and discrimination, neglect and exploitation, is as far as possible, built into the work practices by itself. If the design and its implementation cannot reduce risks sufficiently, BRAC has installed secondary safeguarding mechanisms, like selecting and training of personnel, supervising and monitoring activities, reporting channels, investigations and punishments.

In the overall safeguarding policy, BRAC has described its history in more than forty years of safeguarding practice. BRAC pledges to continue its vigilance. The safeguarding policy also describes BRAC's ethos and prevention practice in general.

Reporting of malpractice and integrity breaches of any type has many channels in the normal work organization. This whistleblowing policy is the safety valve, to ensure that breaches of any kind, not only can, but also will be reported, anonymously if necessary.

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2. Scope

This policy should be read and interpreted in line with the overarching Safeguarding Policy. The aim of this policy is to enable employees to report unethical or any other behavior that potentially breaches BRAC's standards and policies on the basis of anonymity and protection.

The policy applies to all employees including regular, contractual, project, service, trainee (including apprentices & interns), volunteers, temporary staffs and non-graded staffs and beneficiaries of BRAC.

Any behavior contrary to BRAC's policies and Code of Conduct can be reported under this policy.

The following is a non-exhaustive list of incidents involving BRAC staff or beneficiaries that can be reported:

- abuse
- sexual harassment
- intimidation
- violence
- bullying
- humiliation
- neglect
- exploitation
- discrimination
- damage to BRAC's assets or property
- Incidents that maybe damaging to BRAC's reputation.

3. Definitions

Whistleblowing

Bringing to the organization's attention activities that may potentially be illegal, unethical or in breach of BRAC's policies, standards and regulations

Reprisal

An act of retaliation as a result of a complaint. For example: the threat of losing one's job or employment related benefit because the person made a complaint

Anonymity

The identity and other personal details of the complainant remaining confidential and anonymous

4. Reporting

Complaints or allegations can be made directly to the **Grievance team** via mailing to **hrd.gmt@brac.net** or calling: **+880-1730346883 and/or +880-1708491000**

Complaints or allegations regarding sexual exploitation can be made directly to **Sexual Harassment Redressal Committee** by mailing to **complaint.shrc@brac.net** or dialing to **+880-1729071546.**

The report can also be lodged in **writing** directly to senior director, executive directors, human resource division, grievance management or sexual harassment redressal committee (SHRC).

For countries other than Bangladesh, complaints or allegations should be made in writing to the Head of Country HRD or Country Representative or Regional Director or Chief People Officer. Circumstances where this is not possible or appropriate, the individual complaining may send an email to the Voice Country team at voice.countryname@brac.net (i.e. For Uganda **voice.uganda@brac.net**).

Whistle Blowing process flowchart:

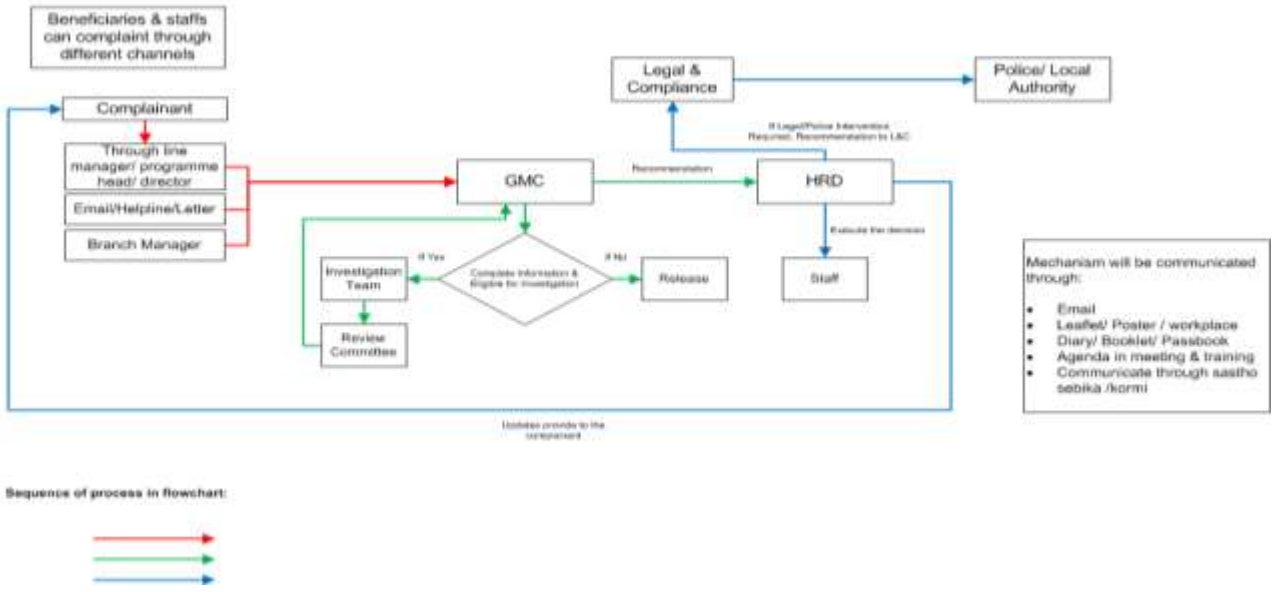


5. Protection of Whistleblower

No action will be taken against the staff person or anyone else for making a report through this channel or for cooperating with the investigators. Disciplinary proceedings may be initiated against any staff member who is proved to have retaliated against a whistleblower or persons assisting by providing evidence to investigators. All reasonable steps will be taken by BRAC personnel to maintain the highest level of confidentiality. Should the situation arise where the issue cannot be properly investigated and/or resolved without disclosing the individual's identity then the responsible designated officer handling the complaint will inform the whistleblower and will discuss whether and how the investigation may proceed. Any unwarranted breach of confidentiality under this circumstance may give rise to disciplinary action.

Depicted below are the complaint mechanisms:

Complaint Mechanism:



If the whistleblower complains of the retaliation the complaint follow the same process depicted in the diagram below:

Whistleblower Complaint of Retaliation:



Grievance Management Committee (GMC):

- The Committee will receive all complaints related to “workplace bullying” and “violence”.
- GMC Chair to take urgent decisions for investigation if required.
- Decides on whether the complaint will go for investigation or not.
- If the GMC does not find a prima facie case it will not go for investigation.
- Forward the complaint to investigation team if so decided.
- Ensure that the entire process is done within time

- The Committee will be divided into two sections; a main committee and a sub-committee.
- The main Committee consists of seven members and the sub-committee consists of seven members.

Grievance Review Committee (GRC):

- This Committee will consist of three members.
- This Committee reviews the investigation report and gives a recommended decision.
- The review committee gives the Accused an opportunity of hearing.

6. Prevention

One of main priorities of BRAC is to prevent harassment and uphold a safe working environment. The preventive measures will be:

- Orientation about current Workplace Harassment and Violence policy during every employees onboarding
- Refresher training for all employees after certain intervals
- Circulate/display a short version of policy procedures at all locations within BRAC establishment
- Circulate leaflet/Poster/Booklet and include the messages in the staff dairy and beneficiary's passbook.

Special Note: The whole process will not take more than 60 days after a complaint has been lodged.

7. Review of Policy and Procedure

The policy will be reviewed at a minimum of every two years or when it is shown necessary that additional issues need to be identified and addressed, such as with a significant change in context or program or change to legislation.