

ETHIOPIAN ORTHODOX TEWAHIDO CHURCH
DEVELOPMENT AND INTER-CHURCH AID
COMMISSION(EOTC-DICAC)

Whistleblowing Policy



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1. Introduction

Ethiopian Orthodox Tewahido Church development and Inter-Church Aid Commission (EOC-DICAC) is the development wing of the Ethiopian Orthodox Church; established in 1972 by legal notice No.415. Accordance with the Civil Society Organizations proclamation No. 1113/2019, the organization has also been re-registered by the Civil Societies Agency as a local organization with registration number 1560. EOC-DICAC envisions ending hunger in the country and all people live in dignified circumstances in a just and sustainable environment. Its mission is to assist vulnerable communities in Ethiopia to attain self-reliance by tackling the root causes of poverty, migration, climate change, and public health and illiteracy problems by promoting sustainable development programs. . Since its establishment, the organization has been implementing humanitarian and development projects in various parts of the country.

EOC-DICAC is committed to the highest standards of openness, integrity and accountability. Employees with any concerns about the organization's work must come forward and voice. Any staff, senior leader, management committee & board members, partner organizations and professionals working with EOC-DICAC who have concerns about the organization's work, and the staff and others working with the organization must come forward and voice.

It does not matter that an individual, who raises a concern, is mistaken about it the staff do not have to prove anything about the allegation they are making. However, they must reasonably believe two things:

1st. They are acting in the public interest i.e. the concern raised, adversely affects the welfare of beneficiaries, third parties or the public at large; as opposed to the welfare of own (personal grievances and complaints about employment e.g. terms and conditions, relationships or working practices). This is addressed under other EOTC-DICAC policies.

However, in case where an employee genuinely considers the issue to be endemic within the organization or their department and no action has been taken in response to a complaint directed to HR, then a whistle-blow may be appropriate.

2nd. The disclosure highlights past, present or likely future wrongdoing falling into one or more of the following dishonest, criminal offences, matter result in origination loss in property or loss of reputation etc.

This policy and all associated procedures apply to all employees of EOTC-DICAC's, board members, consultants, contractors and partners and volunteers and other individual and entities working for the mission of EOTC-DICAC's mission.

The policy should be read in conjunction with other EOTC-DICAC's policies mentioned below (not an exhaustive list):

- Administration of Medication Policy
- Anti-Fraud, Bribery and corruption policy
- Anti-terrorism and Money laundry policy
- Safe Guarding Policy



- Conflict of Interest Policy
- Child Protection Policy
- Fleet Management Policy
- Health and Safety Policy
- EOC-DICAC's Human Resource Development, Finance Manual and Procedures, Procurement Manual, Store Management and Warehousing Policy, Audit and Inspection Manual and Guidelines

Failure to comply with these policies and procedures may result in disciplinary action, which might include dismissal and referral to justice organ.

2. Principles Of The Policy

To ensure that this Policy is adhered to and to assure that the concern will be acted upon seriously, EOC-DICAC will:

- 2.1. Ensure that the Whistle Blower and/or the person processing the Protected Disclosure is not victimized for doing so.
- 2.2. Treat victimization as a serious matter including initiating disciplinary action on such person/(s).
- 2.3. Ensure complete confidentiality.
- 2.4. Not attempt to conceal evidence of the Protected Disclosure.
- 2.5. Take disciplinary action, if any one destroys or conceals evidence of the Protected Disclosure made/to be made.
- 2.6. Provide an opportunity of being heard to the persons involved.
- 2.7. The Whistle Blower should bring to the attention of the competent authority at the earliest any improper activity or practice. Although they are not required to provide proof, they must have sufficient cause for concern.

3. Purpose

- 3.1 This policy aims to provide the means and appropriate communications, and to encourage and provide staff the confidence and guidance to report all genuine suspected wrongdoing, dishonesty and fraudulent matters, in a timely manner.
- 3.2 To reassure staff and whistleblowers such matters will be dealt with seriously and effectively and confidential manner within EOC-DICAC internally, giving appropriate protection to the identity of the informant as required.
- 3.3 This policy presumes that such reports of wrongdoing will be made in good faith and not maliciously, recklessly or for personal gain. Any such reports that are not made in good faith, may be subject to action under EOC-DICAC disciplinary procedures.

4. Scope



- 4.1. This Policy applies to the EOC-DICAC Board, all EOC-DICAC head quarter, coordination office and project staff, including affiliate organizations, and consultants, contractors, volunteers that provide supplies, services or support, to EOC-DICAC.
- 4.2. This Policy also applies to EOC-DICAC partners, vendors and other third parties, where it is included or referenced in relevant bid or tender documents, agreements, memorandums, purchase orders or contracts.

EOC-DICAC's whistleblowing policy is intended to address mal practices or matters of a serious nature relating to conduct by EOC-DICAC or its employees. These include conduct that constitutes a criminal offence, failure to comply with legal obligations, miscarriage of justice, health and safety danger, environmental risk or a concealment of any of these, whether the conduct has occurred, is occurring or is likely to occur.

The whistleblowing policy does not encompass matters such as; allegations of discrimination, bullying or harassment; perceived unfair treatment by a line manager; complaints about the work environment; issues concerning pay or benefits. These should be referred to the relevant Human Resources development manual and guidelines and others, as designated by those Policies.

5. Key Terms and Definitions

Whistleblowing: is the process through which an individual raises a concern or disclosure about wrong doings or serious malpractices within an organization.

A whistleblower; is an individual who alerts, via the appropriate channels, an organization on serious malpractice or actions that endanger the organization employees or assets. The individual could be an internal party (e.g. employee) or an external party (e.g. suppliers, customers or the general public).

Malpractice: is defined as improper or unethical behavior being committed or likely to be committed, which includes but is not limited to the following:

Examples include:

- Dishonesty, fraud or corruption;
- Instances of bribery or suspected terrorist engagement or involvement;
- Illegal acts (e.g. theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of law);
- unethical actions (e.g. dishonestly altering company records, engaging in questionable accounting practices or willfully breaching the organization's Code of Conduct);
- Actions that are potentially damaging to the organization or dangerous to individuals connected with it (e.g. unsafe work practices, substantial wasting of resources);



- Actions likely to cause financial loss to EOC-DICAC or damage its reputation or be otherwise detrimental to organizational interests; and
- Any other kind of serious impropriety.

Mal practice does not usually include personal employment grievances (such as bullying, harassment, discrimination, unsatisfactory probation reports, performance evaluation, discriminatory work assignments, equal employment opportunities, sexual harassment) or general complaints. These should be dealt with through the channels provided for in the Group Human Resources Development Manual and Guideline.

However, in cases where an employee genuinely considers the issue to be endemic within the organization or their department and no action has been taken in response to a complaint directed to HR, then a whistle-blow may be appropriate.

6. REPORTING EVIDENCE OF MAL PRACTICE OR MISCONDUCT

6.1. Scope of Allegations Covered

EOC-DICAC whistleblowing procedures are intended to address matters of a serious nature relating to conduct by EOC-DICAC or its employees. These include conduct that constitutes a criminal offence, failure to comply with legal obligations, miscarriage of justice, health and safety danger, environmental risk or a concealment of any of these, whether the conduct has occurred, is occurring or is likely to occur. Examples include Dishonesty, fraud or corruption; Instances of bribery or suspected terrorist engagement or involvement; illegal acts (e.g. theft, drug sale or use, violence, harassment, criminal damage to property or other breaches of law); unethical actions (e.g. dishonestly altering company records, engaging in questionable accounting practices or willfully breaching the organization's Code of Conduct); actions that are potentially damaging to the organization or dangerous to individuals connected with it (e.g. unsafe work practices, substantial wasting of resources); actions likely to cause financial loss to EOC-DICAC or damage its reputation or be otherwise detrimental to organizational interests and any other kind of serious impropriety.

Generally the whistleblowing procedure does not encompass matters handled by the organization's Grievance or Dignity at Work Policies (e.g. allegations of discrimination, bullying or harassment; perceived unfair treatment by a line manager; complaints about the work environment; issues concerning pay or benefits). These should be referred to the relevant Human Resources representative as designated by those Policies.

6.2. Making an Allegation

- 6.2.1. In most cases, an employee should raise any concerns they may have internally within EOC-DICAC.



6.2.2. If appropriate, an employee should discuss his/her concerns with his/her line manager. An informal approach to the line manager will be treated in the strictest confidence. It will not result in a report to anyone within EOTC-DICAC without the employee's agreement, except where the line manager believes that the issues raised are so serious that further action may be required. Where this is the case, the line manager will refer it to human resource development department.

6.2.3. Should an employee believe that reporting an allegation as laid down in 6.2.2 is not appropriate, given the factual circumstances of the allegation, then the report may be made directly to human resource development department or audit and inspection department by the following means.

Human Resource Development Department

Email: info@eotcdicac.org

By Post Physical Presence at EOC-DICAC Head Office, Arat Kilo In front of Tourist Hotel, Addis Ababa

Telephone no: +251911241985

Audit and Inspection Department Human Resource Development Department

Email: info@eotcdicac.org

By Post Physical Presence at EOC-DICAC Head Quarter, Arat Kilo In front of Tourist Hotel, Addis Ababa

Telephone no: +251-911699437

6.2.4. If an employee feels it is inappropriate to raise his/her concerns directly with anyone who is part of the day-to-day management of EOC-DICAC, then he/she is quite at liberty to contact the Chairman of the Board of Directors of EOC-DICAC, in writing, marking the envelope Personal and Confidential. The envelope will then be forwarded unopened and the approach will be treated in the strictest confidence. The Chairman will then appoint the most appropriate board member to investigate.

6.2.5. If the employee remains unhappy about the speed or conduct of any further action taken or the way in which their concerns have been resolved, he/she should refer the matter to the Chairman of the Board of Directors of EOC-DICAC.

6.2.6. Disclosures to the press will not be considered reasonable. They will constitute misconduct and will be treated as a disciplinary matter in accordance with EOC-DICAC's Policy and Procedure.

6.2.7. If, at any stage in the procedures, employees are unsure about what to do and would like independent advice, they might like to discuss their concerns with someone at Public Concern at Work.

6.3. Content of Allegations

An allegation should contain as much specific factual information as possible including:



- A clear statement that the allegation is being raised as a whistleblowing matter. Comments which are made in passing to Board Members or to EOC-DICAC's Management committee and which do not follow the prescribed whistleblowing procedures will not be deemed as whistleblowing allegations;
- All facts describing the alleged event, issue or matter;
- The name of each person involved;
- Dates, times and locations;
- Facts relevant to urgency; and
- Documentation, witnesses, or other supporting evidence.

6.4. Dealing with Disclosures

6.4.1. If an employee reports a disclosure to EOC-DICAC, the need for confidentiality will be respected wherever possible, although any concern raised under this procedure will need to be properly documented.

6.4.2. EOC-DICAC believes that all employees should be able to put their name to the allegations which they raise, as concerns expressed anonymously are more difficult to investigate. If employees raise a concern anonymously, depending upon the exact circumstances, it may nonetheless be possible for their identity to be deduced. If, contrary to this policy, they then suffer reprisals, it may be difficult to show that this was as a result of them raising a concern, i.e. it may not be possible to protect unidentified people

6.4.3. The action taken in response to a disclosure will depend on the nature of the concern. By way of example, the matters raised may result in one or more of the following:

- No action required.
- Action being taken under other EOC-DICAC policies and/or procedures.
- An internal investigation under this policy.
- A referral to the police.
- A referral to EOC-DICAC's external auditors.
- A referral to the Civil Society Organizations Agency.
- .
- An independent enquiry.

6.4.4. The responsible person to whom the disclosure is made will:

- Make a detailed record of the disclosure.
- Ask the employee to provide a written statement describing the precise nature of the allegations.

6.4.5. Upon receipt of the written statement, decide whether any further action may be required. Where it is, they will refer it to the appropriate person and write to the employee within five working days of making that decision. In their letter, they will acknowledge receipt of the



allegation provide information on who it has been referred to and details of who the employee should contact if they have any further questions.

6.4.6. Where further action is required under this policy in relation to an employee's complaint, this will typically, in the first instance, take the form of an internal investigation. The internal investigator will be the one delegated to undertake the task by responsible organs of the commission i.e. Board chair or commissioner or audit and inspection department or human resource development department depending on the circumstances. However, EOC-DICAC may instead decide to arrange for a suitably qualified independent professional to undertake the investigation.

6.4.7. During the investigation, the employee who reported the disclosure may need to be called upon for interview. They will also be given appropriate updates of progress made during the investigation, whilst bearing in mind the need to respect the confidentiality of other workers as well.

6.4.8. Once the investigation is complete:

- The employee will be given a prompt and thorough explanation about the result of the investigation and any action EOC-DICAC is likely to take as a result of it.
- As any allegation under this policy should be reviewed by the Executive Team. Where the allegation is deemed to be of a serious nature, an appropriate report will be submitted to the Board of Trustees.
- Any action which the investigator decides is required will be taken.

6.4.9. EOC-DICAC recognizes that there may be matters which cannot be dealt with internally and external authorities may need to become involved, including the police and the Charity Commission. Where this is necessary, EOC-DICAC reserves the right to make such a referral without the reporting employee's consent.

6.4.10. Any employee who has a genuine reason for their disclosure should feel confident in bringing forward their concerns.

6.4.11. EOC-DICAC will not tolerate any employee being subjected to a detriment as a result of their making a disclosure in good faith. In the event that any employee believes that they have been subject to a detriment by anyone within EOC-DICAC for this reason, they must inform the Chairman of the Board of Director immediately and appropriate action will be taken to protect them from any reprisals.

6.4.12. If anyone should try to discourage an employee from coming forward to express a genuine concern, EOC-DICAC will treat this as a disciplinary matter. In the same way the commission will deal severely with anyone who criticizes or victimizes an employee or otherwise subjects them to a detriment for raising a concern.

6.4.13. However, if it should become clear that the procedure under this policy has not been invoked in good faith (for example, falsely or for malicious reasons or to pursue a personal grudge against another employee), this will constitute misconduct and it will be treated as a disciplinary matter in accordance with EOC-DICAC Disciplinary Procedure.



6.4.14. Any employee who, in good faith, makes allegations that turn out to be unfounded will not be penalized for being genuinely mistaken.

6.5. cooperation

An employee who fails to cooperate in an investigation, or who deliberately provides false information during an investigation, shall be subject to disciplinary action up to, and including, dismissal as prescribed in the HR Policy. Any person named in a report will be given an opportunity to be heard and defend themselves before any action is taken.

6.6. Records Keeping

At the end of the proceedings, all records of the investigations are surrendered to Ethics Committee who must keep these records for a minimum period of seven (7) years after the completion of the proceedings and he/she must ensure that they are backed up.

6.7. Confidentiality

6.5.1. All information relating to the whistleblower, witnesses and information carriers, the reported conduct and any subsequent investigations must be treated confidentially to the extent permitted by applicable laws or regulations.

6.5.2. Information relating to the identity of the whistleblower, the reported conduct and the investigation process or results must not be disclosed or discussed with anyone other than those who have a legitimate need to know, or unless required by applicable law or regulation. This is important in order to protect the whistleblower, the integrity of the investigation, the reputations of persons suspected but subsequently found innocent of wrongful conduct, and to protect the commission from potential civil or criminal liability.

6.8. Implementation of the Policy

This Whistleblowing Policy comes into effect after approval by the Board of EOTC-DICAC on November 19, 2020.

