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An Initiative of Association for Voluntary Action (AVA)

Whistle Blower Policy

WHISTLE BLOWER POLICY

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1. Introduction

Association For Voluntary Action (“**AVA**” or “**the Organization**”) is committed to adhere to the highest standards of ethical, moral and legal conduct of operations. To maintain these standards, the Organization encourages its associates/employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. This Whistle Blower Policy (“**this Policy**”) aims to provide an avenue for employees to raise concerns on any violations of legal or regulatory requirements, incorrect or misrepresentation of any financial statements and reports, etc.

2. Purpose

The purpose of this Policy is to articulate the process, procedure and to strengthen reporting of any inappropriate conduct (actual or perceived) at Organization.

The Policy shall not only encourage associates/employees to come forward against any acts detrimental to the work (e.g. fraud, corruption, misconduct, etc.) and the holistic development of Organization but also acts as a vigilant system for promoting a work culture that is deeply rooted in the ethics and values of the Organization.

3. Scope

This Policy is applicable to all Associates (as defined below) of Organization, including all employees, consultants and Board of Trustees (“**Board**”). This Policy is equally applicable to third parties to report a concern related to a potential violation of the Organization’s Code of Conduct. The Policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation.

4. Definitions

Associate: shall mean and include all employees/staff on rolls of Organization, volunteers, trustees, consultants, members of the Board and members of any of the committees of Organization;

Complaint: The written or electronic communication by the whistle blower in good faith given to the Grievance Redressal Committee to report a legitimate concern over any act/conduct by the respondent, which is, or is likely to cause organization financial, operational or reputational loss or damage and be detrimental to the work of the Organization;

Grievance Redressal Committee or GRC: shall refer to the committee constituted by Organization for the purposes of receiving complaints and grievances;

Respondent: Any associate against whom a complaint has been reported to Organization's Grievance Redressal Committee;

Whistle Blower: shall mean any Associate/employee or Board member who discloses or demonstrates an evidence of an unethical activity or any conduct that may constitute breach of the Organization's Code of Conduct or Values.

5. Requirements/Policy Implementation

a) Reporting

Any Director/Board member/Associate willing to disclose information may do so in any of the following manner:

- i. Through e-mail, or in writing, duly addressed to the GRC in sealed envelope specifically superscribed as "Disclosure under Whistle Blower Policy";
- ii. Suitable proof of Whistle Blower's identity/contact numbers/address so that additional information, if any, can be obtained. In case identity cannot be ensured, the complaints will be treated as anonymous/pseudonymous complaints, and may not attract further action;
- iii. Where disclosure is made by telephone, the Whistle Blower would be required to disclose his/her identity and furnish sufficient information for verifying his/her identity;
- iv. The details in the complaint should be specific and verifiable.

b) Inquiry

- v. The inquiry/investigation shall be conducted by GRC in a fair manner and provide adequate opportunity for hearing to Whistle Blower as well

- as the Respondent and a written report of the findings should be prepared for submission;
- vi. A time frame of maximum 30 days will be permitted to complete the investigation/enquiry. In case the same cannot be completed within stipulated period, interim report should be submitted by the GRC giving inter alia, the tentative date of completion;
 - vii. In case the disclosure made does not have any specific & verifiable information, the GRC will be authorized not to take any action. This would be suitably recorded;
 - viii. In case the allegations made in the disclosure are substantiated, appropriate departmental action will be taken against the Respondent;
 - ix. If found guilty, the Organization may take the following necessary action:
 - Censure or fine;
 - Warning (written or oral)/show cause notice;
 - Suspension without any payment for a period not exceeding 30 days;
 - Withholding of performance-linked increment;
 - Demotion to a lower post and scale of pay;
 - Termination and dismissal from service
 - x. Any Associate who knowingly and maliciously makes false allegations under this Policy shall be liable to disciplinary action, up to and including termination, in accordance with Organization HR Manual;
 - xi. The action taken against the Respondent as stated in the above paragraph will be in addition to any other action or prosecution which may be initiated against said Respondent under any statute or law in force.

c) Protection to Whistle Blower

Organization shall ensure the following in pursuance of this Policy:

- i. That no Associate involved in reporting or processing of a Complaint under this Policy faces discrimination, retaliation or harassment for discharging their duties;
- ii. That disciplinary action shall be initiated against Associate(s) indulging in harassment of any Whistle Blower and other concerned Associate(s);
- iii. That confidentiality shall be ensured during all investigations and proceedings under the Policy. Organization also affirms that the whistle blower shall be protected against unfair termination and any other unfair employment practices. Malicious complaints shall not be protected;
- iv. That disciplinary action shall be taken if any one destroys or conceals evidence shared under any Complaint;

- v. Adequate opportunity shall be provided to all concerned associates for being heard, especially the Respondent(s);
- vi. The Whistle Blower has the right to approach the GRC if there is a perceived threat or if s/he is facing harassment as a consequence of her/his Complaint. GRC will review the Complaint and take appropriate measures.

d) Rights of the Respondent

- i. Respondent(s) have the right to be heard and GRC ought to give reasonable time and opportunity to them to communicate their opinions and other facts known to them during proceedings under the Policy;
- ii. Respondent(s) have the right to receive written communications by the GRC of the final outcomes of the investigations initiated as per this Policy.

e) Role of Grievance Redressal Committee

GRC shall convene meetings as required to process Complaint(s) received under the Policy. Following shall be the core responsibilities of GRC:

- i. Conducting proceedings & inquiry in each Complaint in an unbiased manner;
- ii. Provide adequate support to the whistle blower and other concerned associates to facilitate processing of Complaints and in related proceedings;
- iii. Ensure confidentiality of all associates involved in the proceedings;
- iv. Ensure protection of Whistle Blower against retaliation and harassment; and
- v. Ensure identity of the Whistle Blower remains protected from the Respondent(s).

f) Record Retention and Access

- i. All documentation pertaining to a Complaint including, but not restricted to the final investigation report, corrective action taken and evidence will be archived & maintained by the GRC for a period not less than 7 years from the date of disposal of the Complaint.
- ii. All reports and records associated with Complaints under this Policy are considered confidential information and access will be restricted by Organization as deemed fit. All concerned records shall not be

disclosed to the public except in cases as required under any legal obligations or judicial orders.

6. Violations of this Policy

An Associate who violates any provisions of this Policy, regardless of whether financial loss to the Organization results or not, may receive appropriate disciplinary action up to, and including termination. This shall be in addition to other legal and remedial actions available to the Organization under the applicable law.

7. Exceptions and Review of Policy

- 7.1** Any deviations from this Policy require approval from the Management Committee;
- 7.2** The Organization reserves the right to modify and/or review the provisions of this Policy from time to time, in order to comply with applicable legal requirements or internal policies, to the extent necessary.



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