



**African Population and
Health Research Center**

WHISTLEBLOWING POLICY

Date of Review	September 2020
Date of Approval	November 2020
Next Review Date	November 2023

INTRODUCTION

The African Population and Health Research Center (APHRC) is committed to facilitating open and honest communications relevant to its governance and operations. APHRC is committed to an environment where open and honest communication is the expectation and not the exception. All incidents of malpractice should be reported without fear of retribution.

APHRC embraces values of integrity, fairness and excellence and works to improve health and wellbeing in Africa. We strive to uphold our values not just in what we do in the workplace but in the way we relate with partners, communities and other stakeholders outside the work environment.

It is important that the Center be informed about unlawful or improper behavior / occurrence including, but not limited to, any of the following conduct:

- theft;
- financial reporting that is intentionally misleading;
- improper or undocumented financial transactions;
- improper destruction of records;
- improper use of Center assets;
- falsification of academic documents;
- falsification of data or results;
- violations of the Center's Human Resources policy;
- safeguarding concerns including harassment and abuse; and
- any other improper occurrence.

An organization's staff are often the first to discern that someone inside or a representative of the institution is engaging in illegal or improper practices, but they may feel uneasy about voicing their concerns. This may be because they are not sure if their concerns will be acted upon, kept confidential or they do not want to feel guilty for getting someone punished. Others still, may not wish to be disloyal to their friends in the organization. However, it is in APHRC's interest that such occurrences do not go unreported for the betterment of staff and the Center. Reports should be made regardless of who is involved in improper behavior. Under no circumstances should concerns about inappropriate behavior be ignored.

Every employee, consultant, partner, supplier or contractor who has a reasonable belief or suspicion about any improper occurrence is therefore urged to report the same. The Center values this input and parties relating with APHRC should feel free to raise issues of concern, in good faith. Employees and any APHRC representative will not be disciplined, demoted, lose their

jobs, lose their contract or be retaliated against in any way for asking questions or voicing concerns about improper conduct.

The need to report arises when any malpractice is observed or suspected, or an allegation of malpractice is made.

WHISTLE BLOWING CHANNELS

The following four channels can be used for reporting:

1. APHRC's Online Incident Management Site

All persons are encouraged to submit reports relating to violations stated in this policy or any of our other policies. APHRC has set up a confidential reporting platform, through the hotline: <https://aphrc.ethicspoint.com>, hosted by a third party, EthicsPoint. . The information provided will be handled by EthicsPoint in an anonymous manner and on a confidential basis. APHRC guarantees that all reports will be acted upon. The site is user friendly and makes it easy to capture and investigate ethics and compliance reports.

Please note that EthicsPoint platform should be the primary reporting channel in cases where one believes violations of policies or standards have occurred, yet the issue is not an emergency and does not pose a threat to life. For emergency cases, APHRC employees and representatives should use both the reporting platform AND any of the other channels mentioned below:

2. Employee Assistance Program

APHRC recognizes that sometimes employees may go through situations at work or they may notice things that they may not feel free to speak about at the workplace with colleagues and or management. These issues could be personal in nature or work related and may require professional psychosocial support. Consequently, APHRC has partnered with the Kenya Association of Professional Counsellors and Amani Counselling Center to provide assistance to our employees in such circumstances.

Employees are thus encouraged to also use such channels for whistle blowing. The external service provider will report in confidence to APHRC taking precautions to ensure anonymity and confidentiality as appropriate.

3. Report to supervisor, Unit Leader, Head of HR, Executive Director or Safeguarding Manager

For incidents that are urgent, reports should be channeled through line managers, Unit Leader, Head of HR, Executive Director, Safeguarding Manager or the Whistleblowing Committee. The committee can be reached through whistleblowing@aphrc.org and its composition is described below. The Director of Operations will be the Safeguarding Manager for the headquarters while the head of the West Africa Regional Office (WARO) will be the safeguarding focal point for that office.

All APHRC representatives are required to respond to any concern, allegation or suspicion of any form of misconduct in a timely manner by reporting them to their immediate supervisor (if it's an employee), Unit Leader, Head of HR, Executive Director. Reports can also be made to the local police or children's department in case of children and other persons at risk, if warranted.

4. Suggestion Box

We encourage any employee or APHRC representative who has a concern to write it down and drop it in any of the suggestion boxes placed at the Center's head office, Dakar office or in the field site offices (Korogocho and Viwandani).

If for any reason the employee believes that any of the above channels of communication is inadequate or not safe, or if the issue being reported is about a member of the whistleblowing committee, the Safeguarding Manager/focal point, the concern should be reported to a supervisor, Unit Leader, any member of the Executive Leadership Team or through any of the other established reporting channels.

The malpractice incident reporting form is [here](#).

WHISTLEBLOWING COMMITTEE

A committee composed of a representative nominated by staff from each office location and the Human Resources Manager will meet to investigate the concerns raised in each of the platforms and will submit a report to management. Management will review the report at least every quarter. The Center will then take appropriate action as it deems justified by the circumstances.

The table below shows advantages of each of the channels. The highest advantage is indicated with 5X (XXXXX). In addition, a decision matrix is provided in Appendix 1 to guide users of this policy on the most appropriate channel to use in different circumstances.

Channel	Confidentiality	Paper trail	Fast action	Anonymity	Counselling
EthicsPoint	XXXXX	XXXXX	XX	XXXXX	-
Employee Assistance program	XXXXX	XX	XXX	XXXXX	XXXXX
Suggestion Box	XXXXX	XX	XXX	XXXXX	-
Supervisor, Unit leader, member, Safeguarding manager	XXXXX	XX	XXXXX	XXX	XX

GOOD FAITH

All concerns raised should be in good faith. Staff and other APHRC representatives therefore should have reasonable grounds for believing the information disclosed is accurate and genuinely shows actions or omissions which indicate fraud, malpractice or misconduct. Disciplinary action will be instituted against:

- anyone who victimizes an employee for raising a legitimate concern;
- anyone who tries to deter someone from raising a legitimate concern; or
- anyone who makes false and malicious accusations or who raises concerns for personal gain.

OTHER CONSIDERATIONS

Anonymous reports will also be accepted. The Center will do its utmost to ensure that complaints, investigations and actions are handled confidentially.

Where total confidentiality is not possible, this will be discussed with the whistle-blower first and the staff or APHRC representative raising the issue will be informed of the action taken and the outcome on the issue raised.

INVESTIGATIONS

In cases where an investigation is required for safeguarding issues, the services of an investigator will be obtained, or an internal investigatory committee will be established by the Safeguarding Manager in consultation with management. The committee shall consist of no less than three people with gender representation. In other cases of whistleblowing, the investigation shall be commissioned by the appropriate Division Director with support from the Operations Director as necessary.

The investigator (or committee) will proceed in accordance with the terms of reference that will be established for the investigation. The investigator will document the situation completely. Upon completion of the investigation, a written confidential report will be provided to the Safeguarding Manager or the respective Division Director.

Any disciplinary action will be handled in accordance with APHRC's *Human Resource Policies and Procedures Manual*.

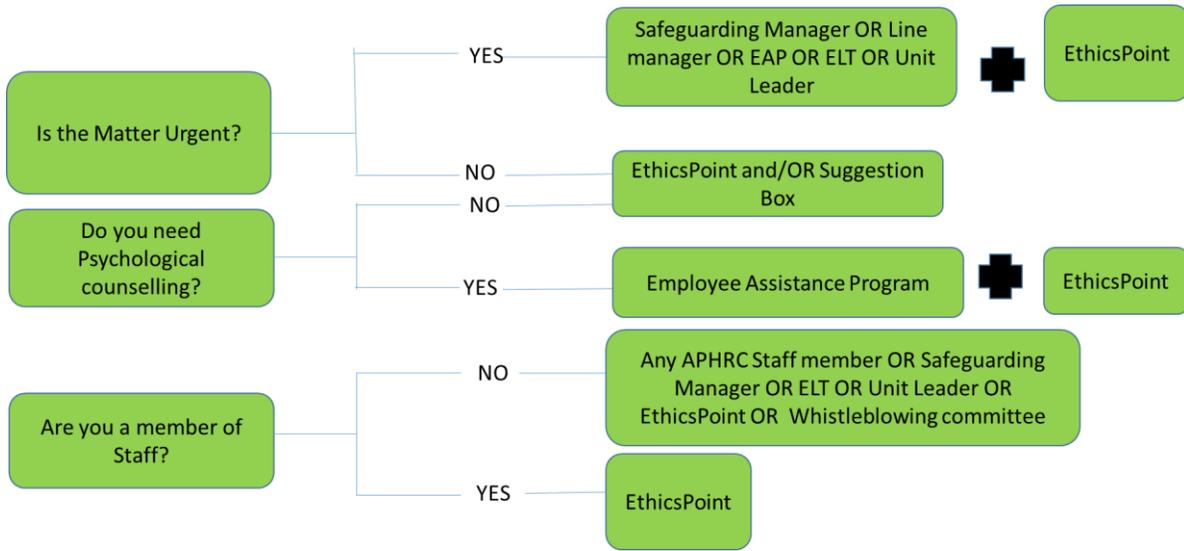
MONITORING AND REVIEW OF POLICY

There will be continuous monitoring and review of the effectiveness of the policy and whistleblowing channels. This policy will be reviewed by the Board every three years or earlier when necessary.

OTHER RELATED POLICIES

- Safeguarding Policy – This policy (whistleblowing) articulates the reporting mechanism for safeguarding incidents which are in turn detailed in the policies on harassment, working with persons at risk, travel, finance, procurement and anti-bribery and anti-fraud.
- Human Resources Policies and Procedures Manual - Stipulates how APHRC handles staff disciplinary matters.

APPENDIX 1 – DECISION MATRIX FOR REPORTING CHANNELS



APPENDIX 2A: MALPRACTICE INCIDENT REPORTING

APHRC has zero tolerance for abuse, harassment, exploitation, fraud and gross misconduct. We take all concerns and reports of these seriously and immediate action will be taken.

What to do if anyone discloses harm or any form of malpractice to you

Receive the information

- Listen to the child/adult
- If you are shocked by what they are saying, try not to show it
- Take what they say seriously
- Accept what the person says if they are classified as a person at risk
- DO NOT ask for (other) information. Do not investigate or question the person. Only ask questions to get enough information to understand the complaint (e.g. 'who, what, where, when' questions, but not 'why' questions)

Reassure the person

- Stay calm, act normally and reassure the individual that they have done the right thing in talking; do not say or show that you are shocked
- Be honest and do not make promises you can't keep
- Do not promise confidentiality – as per our policy you have a duty to refer the individual who is at risk
- Acknowledge how hard it must have been for them to tell you what happened

React

- React only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate them for details
- Do not ask leading questions
- Explain and if possible seek agreement that you will have to discuss the situation with someone else and will do so on a 'need to know' basis.

Record

- Make some brief notes at the time and write them up more fully as soon as possible
- Take care to record timing, setting and person(s) as well as what was said

- Be objective in your recording – include statements and observable things rather than your interpretations or assumptions

Report

- Report the matter using any of the above channels and/or report to anyone else in authority if necessary

APPENDIX 2B: MALPRACTICE INCIDENT REPORTING FORM

This form should be used to report if you see or suspect abuse or harassment or fraud or other gross misconduct, if an allegation of is made, or if anyone discloses abuse or harassment or misconduct to you. The information you provide here will be kept CONFIDENTIAL and all steps will be taken to ensure you are supported by management and that your protection is considered in any actions taken. Please provide as much information as possible. Areas where you have nothing to report should be left blank.

First report through EthicsPoint (<https://aphrc.ethicspoint.com>).

In addition, if the matter is urgent, report using any of the other channels outlined in the whistleblowing policy. These may include the safeguarding manager (safeguarding@aphrc.org), your supervisor, the Unit leader, a member of ELT. If you report by email, use the subject: 'URGENT: Attention, please treat this email confidentially'

Part One: About You

Name: _____ Contact: _____

Your role in (APHRC or partner organization): _____

Details of any other organization involved: _____

Your relationship to the person concerned:

Part Two: About the Person (Child/Adult)

Name(s): _____

Male/female: _____ Age: _____

Address:

If a child, whom does he/she live with?

Part Three: About Your Concern

How did you come to have a concern: was abuse/harassment or policy non-compliance observed or suspected?

Was an allegation made? _____

Did a child, young person or adult disclose abuse? _____

Date, time and place of any incident(s) reported to you:

Nature of concern/allegation:

Observations made by you (e.g. child/person's emotional state, any physical evidence)

Write down exactly what the child or person making a report said and what you said (or another informant said): continue on a separate sheet of paper if necessary.

Any other relevant information? (E.g. disability? language?)

Were other children/adults involved or aware?

Have you already spoken to parents/guardians or any other person or organization? Yes ____ or No ____ If Yes, who or whom? _____

Time and date of reporting: _____

Person(s) to who report was made: (name of supervisor/manager/staff):

Advice given by that person or organization:

Action taken (if any):

Any other comment:

I understand that in making this report APHRC may have to inform other authorities, in a confidential manner and only if necessary for the safety of a child, adult, the staff member, or the organization, or to meet obligations to donors or under national law.

Signed: _____ Date: _____

Note: Please remember that all information contained in this report must be kept confidential and must not be revealed to anyone except the person you reported to. You will be informed of next actions that will be taken

Signed: _____ Date: _____

APPENDIX 3: PERMISSION FOR COLLECTION AND USE OF CONTENT

APHRC representative to translate and/or read this statement: “APHRC uses photos, video, interview answers and audio to share information about the research we do in order to provide governments and other actors evidence to use in policy and action. To do this, we request your permission to take an interview, audio, photos and/or videos. The material may be used in external communications by APHRC and our partners, in your country, and internationally, and will be held securely in our database.

Date: _____

Translator/field worker: “I confirm I have translated and/or explained the information above.”

Signed: _____ Name: _____

Participant: “I understand the information above, and give my permission for my content to be collected and used as indicated below.”

1) **Participants/group’s name:** _____ Age: _____

2) I am [tick as appropriate]:

Over 18 and I sign for myself

A parent signing for a child under 18: My name is _____

Signing for a group: My relationship to the group/job role is _____

3) I agree to APHRC’s representative [tick all that apply]:

speaking to me and recording my words

taking my photograph

making a video

4) I agree to APHRC and partners using my [tick all that apply]:

Story

Voice audio

Photos

Video

5) I agree for my content to be used in [tick all that apply]:

Newspapers

The internet

Social media

Radio

Television

Publications/educational materials

6) In [tick all that apply]:

My country

Internationally, except the following country [if applicable]

7) Signature/thumbprint

Participant: _____

Parent: _____

For interviewer: Identifier/Description: _____

APPENDIX 4: CODE OF CONDUCT FOR BOARD/FUNDERS/PARTNERS/VOLUNTEERS/GUESTS

I, (insert name) _____ agree to report any concerns or incidents involving harassment, abuse, exploitation, fraud, or any other forms of misconduct.

I will:

- Respect an individual 's dignity and their need to be safeguarded at all times when taking photographs, filming or writing reports.
- Protect and handle personal data of others with care, to minimize the risks posed by third parties who receive information about children and adults from APHRC or its partner organizations.
- Respond to safeguarding concerns by reporting them to the Executive Director or any other appropriate APHRC representative.
- Uphold ethical conduct in all my dealings with APHRC staff and other representatives
- Comply with any investigation led by official bodies (including interviews) and make available any information necessary.

I will not:

- Engage in sexual activity or have a sexual relationship with a child, regardless of consent or local custom. Mistaken belief in the age of a child is not a defense.
- Condone or in any way force an adult, or a child, to participate in any form of sexual activity, real or simulated, on the internet or in any other medium.
- Make sexually suggestive comments or actions to a child, even as a joke
- Touch, hold, kiss or cuddle a person at risk in an inappropriate and/ or culturally insensitive way.
- Marry a person below the age of 18, regardless of consent or local custom.
- Help at-risk persons with acts of an intimate or private nature, which they can do for themselves. Such actions may only be undertaken for an individual who has acknowledged the need for that assistance directly, or through a parent/guardian.
- Engage in activities involving close body contact with at-risk persons, beyond professional requirements.
- Hit or otherwise physically assault, or physically abuse anyone, nor use any form of corporal punishment as a disciplinary measure.
- Condone, or participate in behavior with adults or children that is illegal, unsafe or abusive, including being part of harmful traditional practices, spiritual, ritualistic or substance abuse.
- Act in ways intended to shame, humiliate, belittle or degrade others, or otherwise perpetrate any form of emotional abuse.
- Exploit adults or children for their labor (e.g. domestic servitude, street begging) or for sexual purposes, or participate in the trafficking of children. 'Child domestic servitude' does not

include occasional house help, babysitting, kitchen gardening during school holidays or general domestic tasks out of school time.

- Develop relationships with children or adults that could be deemed exploitative or abusive.
- Spend excessive time alone with a person at risk away from others, behind closed doors or in a secluded area
- Take a person at risk, who has been involved in our programs with APHRC, to my home, or visit them in their home where I may be alone with them.
- Engage in behavior with intent to defraud or gain undue financial and other material advantage over the Center

Location and date: _____

Signature: _____

AFRICAN POPULATION AND HEALTH RESEARCH CENTER (APHRC)

WHISTLEBLOWING POLICY

I, _____ (*Name*), have received a copy of the Whistleblowing Policy dated *September 2020*. I have read and understood it and agree to adhere, at all times, to the stipulated terms. I acknowledge that this policy is a contract of employment. I also understand that I shall be subjected to the stipulated consequences, if I fail to adhere to the terms.

Signed: _____

Date: _____