



# Whistleblower Policy

**Title of Policy:** Whistleblower Policy

**Approved Date:** January 2023

**Review Date:** January 2024

**Approved By:** Patrice Davison, Executive Director

**Policy Rationale:** Children's Future International (CFI) must uphold the highest standards of organizational management and ethics, including following all policies approved by the organization. In particular, the Child Protection and PSEA policy are paramount to ensuring the safety of the children and communities in which CFI works. In addition, CFI must uphold Finance Policies and other anti-corruption policies to ensure organizational health is maintained so that CFI may continue to exist. In order to uphold these policies, a culture must exist in which there are both the explicit pathways for reporting AND that staff, children and community members feel safe and comfortable using those reporting pathways.

**Definition:** A 'whistle-blower' is someone who exposes any kind of information or activity that is illegal / unethical / against organization policies (e.g. fraud, corruption, abuse, PSEA etc)

**Policy application:** This policy applies to all associates of Children's Future International: directors, officers, employees, volunteers, interns, prospective employees, counterparts, consultants, contractors, partner organization members and visitors. Henceforth, the term "CFI associates" will be used to represent these groups, for which the Policy is relevant and applicable.

**Policy:**

All CFI associates are expected to act in accordance with; all applicable laws and regulations in Cambodia; all applicable laws and regulations of the United States (i.e. finance/tax law, 501c3 status, etc); with the policies of CFI at all times; and to assist in ensuring that CFI conducts its business and affairs to the highest ethical standard.

Any CFI associate who has engaged in, or who reasonably suspects any other CFI associate of engaging in any violation of the law, regulations, ethical rules or any policy of CFI must report such activity as soon as possible. Such activity may include, but is not limited to: financial wrongdoing (including circumvention of internal controls or violation of the accounting policies of the organization), fraud, harassment, or any other illegal or unethical conduct.

**Reporting process:**

If the violation is related to sexual exploitation and abuse, the PSEA policy should be followed, including using the reporting methods and tools outlined in the policy.

If the violation is of an ethical matter not related to PSEA, the CFI associate may report to the feedback box, their supervisor, or to any of the CFI directors. If the concern is related to one of the CFI directors or Board members, the report may be made to the President of the Board of Directors. (See Annex 1).

Any person receiving such a report must refer it to the Executive Director who must refer it to the President of the Board of Directors as soon as possible. Reports may be made anonymously, however the obligation to report a violation of a law, regulation or policy of CFI is not satisfied by the individual reporting his or her own violation anonymously.

All reports will be investigated and handled in a timely and sensitive manner. The person who reported will receive confirmation that their report is being investigated within one week (not necessarily the result of the investigation). Confidentiality will be maintained throughout the investigation to the extent reasonable and practicable under the circumstances, and consistent with appropriate investigative and corrective action.

There will be no adverse employment action or other retaliation against any individual who reports a suspected violation or assists in an investigation, except in those instances where CFI determines that a false report was made with intent to harm the organization or an individual within the organization.

Intimidation, coercion, threats or discrimination against any individual who reports suspected wrongdoing is prohibited and will be subject to appropriate disciplinary action, which may include termination.

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## **7 TIPS FOR WHISTLE-BLOWERS**

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### **1. SPEAK WITHOUT FEAR**

- CFI will ensure whistle-blowers are protected and not mistreated, if disclosures comply with policy and are in good faith, even if allegations are found to be untrue
- Any information given will be treated with the maximum confidentiality possible. If the whistle-blower requests anonymity, it will be respected.

### **2. DISCLOSE TO AN APPROPRIATE PERSON**

- Procedures in place so that staff complaints are dealt with professionally; not aired outside of CFI or as a topic of scandal within CFI creating a toxic environment, or creating irreparable damage to someone's reputation, before they have a chance to be investigated.
- 'Appropriate person' may include; Human Resource officer, line managers, Executive Directors, Board of Directors, or a Child Protection Officer for suspected child abuse.
- Whistle-blowers have the right to bypass their own manager if the allegation is against them and go to the next manager in line, or directly to the Executive Director or President of the Board.

### **3. KNOW THE PROCESS**

- Appropriate investigating officer(s) are assigned who will document; 1) full details of the complaint, 2) all their investigation procedures, 3) Evidence of their findings and 4) final report on their findings. This will be presented to the appropriate management (depending on who is being investigated).
- In some more serious instances, it is necessary to suspend the staff member that is being investigated, during these procedures.

### **4. TRY NOT TO REMAIN ANONYMOUS**

- During investigation, questions need to be asked. By sending anonymous disclosures, investigations become more problematic.
- Anonymous allegations are generally less reliable (e.g. the spreading of malicious rumors in group emails or Facebook group to damage a colleague's reputation).

### **5. UNDERSTAND THE POTENTIAL CONSEQUENCE**

- Where allegations are found to be true, persons in management may invoke disciplinary procedures, or termination of employment, or where criminal activity has taken place; filing a police report
- Where allegations are unfounded, no further action will take place, against both the whistle-blower who reported in good faith, and the person being investigated

### **HAVE KNOWLEDGE OF THIS POLICY**

- Ensure that colleagues, current and new, are aware of this policy.
- If someone talks to you about a suspicion, advise them of this policy
- If you hear rumors, remind people of this policy and the appropriate steps to take, and minimize office gossip which can damage a person's reputation if unfounded.

**REMEMBER; CFI HAS A ZERO-TOLERANCE POLICY ON OF ANY ABUSE INCLUDING SEA & CORRUPTION**

- CFI is committed to high standards of openness, transparency and accountability.
- Take time to familiarize yourself with CFI Regulations, Policies and Standards of

Annex 1:

Contact information for the President of the Board of Directors:

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