

GRIEVANCE AND WHISTLEBLOWER POLICY

1. Purpose of this policy

IMPACT is committed to upholding the highest standards of integrity, accountability, and transparency. This integrated Grievance and Whistleblower Policy establishes accessible, fair, and confidential mechanisms for addressing grievances and reporting misconduct, ensuring that all individuals can raise concerns safely and without fear of retaliation.

2. Scope and Applicability

This policy applies to all IMPACT staff, contractors, consultants, interns, volunteers, partners, beneficiaries, and community members in countries where IMPACT operates.

3. Interconnection with Other Organizational Policies

This Grievance and Whistleblower Policy is part of IMPACT's broader framework for ethical conduct, accountability, and safe working environments. It should be read in conjunction with the following key policies, which together reinforce our organizational values and obligations:

- **Code of Conduct** – Defines the expected standards of behavior for all individuals engaged with IMPACT.
- **Anti-Corruption Policy** – Outlines procedures and commitments to prevent, detect, and respond to fraud, bribery, and other corrupt practices.
- **Safeguarding Policy** – Establishes protocols to protect the safety, dignity, and well-being of beneficiaries, staff, and communities.
- **Workplace Violence and Harassment Policy** – Sets out preventive measures and responses to ensure a safe and respectful work environment.
- **Conflict of Interest Policy** – Identifies situations where personal interests may conflict with organizational duties and how to address them.

These policies are interdependent and together establish the ethical and operational standards guiding all IMPACT personnel and partners. Stakeholders are encouraged to review and understand these documents to ensure compliance and uphold a culture of integrity and respect.

4. Definitions

Grievance:

An individual or collective complaint raised by people who are *personally and directly* affected by a decision, action, behaviour, or omission linked to IMPACT's work.

Purpose: to resolve a perceived unfairness or harm to the complainant.

Typical content: employment conditions, day-to-day programme impacts on communities, application of internal policies, interpersonal treatment.

Whistleblowing:

A confidential disclosure of *serious wrongdoing* that threatens the wider public interest or the integrity of IMPACT, whether or not the reporter is personally affected.

Purpose: to alert the organisation (or authorities) to fraud, corruption, abuse, or other violations so they can be documented and investigated.

Typical content: fraud or theft of donor funds, sexual exploitation or abuse, human-rights violations, deliberate concealment of illegal acts, retaliation against reporters.

5. Principles

- **Confidentiality:** All reports are handled confidentially, and reporters may remain anonymous if they choose.
- **Non-retaliation:** Retaliation against individuals who report grievances or misconduct in good faith is strictly prohibited.
- **Transparency and Fairness:** All complaints are reviewed impartially and follow a clear process.
- **Accessibility:** Multiple, safe, and culturally appropriate reporting channels are provided.

6. Grievance Mechanism

6.1 Informal Resolution

Individuals, including employees, community members, and stakeholders are encouraged to raise concerns directly with the person involved, such as field staff or their supervisor, whenever it is appropriate and safe to do so. This helps ensure timely and constructive resolution.

6.2 Formal Grievance Submission and Escalation

If the issue cannot be resolved informally, individuals may escalate the concern through formal channels. Grievances can be submitted to designated field staff such as community liaison officers or project focal points, who are responsible for handling them with confidentiality and sensitivity.

If the matter remains unresolved, individuals may request to speak with the Project Manager or Country Representative overseeing the area.

6.3 What to Report (Grievances)

A grievance is a concern raised by someone who is personally affected by a decision, action, or behavior linked to IMPACT's work. Grievances typically relate to:

- Unfair treatment in the workplace
- Disagreements or interpersonal conflict
- Working or living conditions for staff or partners
- Project-related concerns affecting a community
- Disrespectful behavior or exclusion
- Misapplication of internal procedures or decisions

If the concern involves **serious misconduct** (e.g., fraud, abuse, corruption) or does **not directly affect you**, it should be reported through the **whistleblower mechanism** (Section 7).

7. Whistleblower Reporting

7.1 What to Report

IMPACT encourages all individuals—including employees, contractors, partners, beneficiaries, and community members—to report any serious misconduct or violations, such as:

- Fraud, theft, or corruption
- Sexual exploitation, abuse, or harassment
- Discrimination, bullying, or workplace misconduct
- Breaches of law, donor regulations, or IMPACT policies
- Environmental or social harm, including violations of donor-specific requirements
- Retaliation against individuals who report concerns in good faith

7.2 Reporting Channels

To ensure accessibility and confidentiality, IMPACT offers multiple channels for reporting:

- Confidential Email: incident@impacttransform.org
- Reporting form on the website: <https://impacttransform.org/en/accountability/>

7.3 Investigation Process and Timeframes

- Acknowledgment: Receipt of the report will be acknowledged within 5 business days.
- Initial Assessment: An initial assessment to determine the validity and severity of the allegation will be conducted within 5 –10 business days.
- Investigation Completion: A thorough investigation will be completed within 30–45 business days, depending on the complexity of the case.
- Communication of Outcome: The whistleblower will be informed of the investigation outcome promptly after its conclusion, ensuring confidentiality and appropriate disclosure.

8. Safeguards and Support for Grievances and Whistleblowing

Protection from Retaliation IMPACT will endeavor to protect individuals who report concerns in good faith from retaliation. “Good faith” means that the individual believes the information they are sharing is true, even if it is later found to be incorrect.

Confidentiality All reports will be treated with the highest level of confidentiality. The identity of the person reporting will not be disclosed without their consent, except when required by law or when disclosure is necessary to prevent harm to others.

Support Services Psychological or legal support will be offered, where needed, to individuals affected by a grievance or whistleblower case, including complainants, witnesses, and survivors.

False or Malicious Allegations While honest mistakes are protected, knowingly making a false report is a serious violation. In line with international standards, staff who knowingly make false accusations may be subject to disciplinary measures.

9. Oversight and Accountability

IMPACT is committed to maintaining a transparent and accountable grievance and whistleblower mechanism. Oversight responsibilities are structured to ensure impartiality, protect confidentiality, and foster continuous improvement.

9.1 Governance and Oversight

Primary Oversight

The Risk and Operations Director holds primary responsibility for overseeing the implementation, monitoring, and overall effectiveness of this policy.

Independent Review

For complex or high-risk grievances or whistleblower cases, an internal review committee composed of at least three members of the Leadership Team who were not involved in the initial handling of the concern will conduct an impartial review. This process ensures independence, reduces conflicts of interest, and supports fair decision-making.

Board Engagement

The Board of Directors will receive regular updates on the policy's implementation and any significant cases, ensuring organizational accountability at the highest level.

9.2 Reporting and Transparency

IMPACT systematically records all grievances and whistleblower reports, including outcomes, while upholding strict confidentiality. Following the initial assessment and verification of a concern—where it meets the defined reporting threshold—a summary will be shared with the donor, in line with international standards and IMPACT's commitment to transparency and accountability.

9.3 Continuous Improvement

- **Policy Review:** This policy will undergo a comprehensive review every two years, or more frequently if necessary, to incorporate lessons learned, stakeholder feedback, and evolving best practices.
- **Stakeholder Feedback:** Feedback mechanisms will be established to gather input from employees, partners, beneficiaries, and other stakeholders to inform policy enhancements.
- **Training and Capacity Building:** Regular training sessions will be conducted for staff and management to ensure awareness and understanding of the policy, reporting mechanisms, and the importance of maintaining an ethical organizational culture.

10. Training and Awareness

IMPACT is committed to creating a culture where staff, partners, and stakeholders feel confident, safe, and supported when raising concerns. Building this culture requires proactive training, accessible information, and regular reinforcement of ethical standards.

10.1 Comprehensive Training

All IMPACT staff and interns will receive dedicated training on the grievance and whistleblower policy during onboarding.

Annual refresher sessions will be mandatory and adapted to roles and contexts (e.g., field-based vs. Global Team staff). Topics will include:

- What constitutes a grievance or whistleblower report
- How to report concerns safely and confidentially
- The meaning of “good faith” and protection from retaliation

- The responsibilities of supervisors and focal points
- Trauma-sensitive management of complaints

Key implementing partners and community focal points will also be offered tailored training to ensure reporting channels are trusted and understood at the local level.

10.2 Field-Based Awareness Activities

In countries where IMPACT operates, country offices will lead ongoing outreach efforts to ensure community members, beneficiaries, and local stakeholders are aware of their right to raise concerns. These may include:

- Posting visual materials in local languages
- Facilitated discussions during project implementation
- Regular staff refreshers during team meetings or retreats
- Role-specific coaching for community liaison and safeguarding officers
- Interactive workshops to explain the policy in an engaging and culturally manner, especially in areas of low literacy.

10.3 Accessible Information

To ensure inclusive understanding, the policy, reporting procedures, and contact details will be made available in the following formats:

- On IMPACT's website in relevant languages
- In physical copies at country offices and partner locations
- As simplified, visual posters or leaflets designed to be accessible to individuals with low literacy levels, including children and other vulnerable groups

10.4 Continuous Communication

To maintain awareness and normalize ethical reporting, IMPACT will include periodic reminders in:

- Internal newsletters and staff bulletins
- Leadership communications (e.g., all-staff meetings, supervisor briefings)
- Identify and train specific staff members with each country office who can act as easily approachable first points of contact for informal advice on the policy, helping to guide colleagues to the correct reporting channels.

11. Review and Updates

To maintain the relevance and effectiveness of this policy:

- Biennial Review: The policy will undergo a comprehensive review every two years to incorporate lessons learned, stakeholder feedback, and changes in legal or regulatory requirements.

- Interim Updates: If significant legal, regulatory, or operational changes occur, the policy will be reviewed and updated as necessary to ensure continued compliance and effectiveness.
- Stakeholder Involvement: Feedback from staff, partners, and beneficiaries will be solicited during reviews to ensure the policy remains responsive to the needs of all stakeholders.

Effective Date: July 2025

Next Review Date: June 2027 (*or earlier if deemed necessary based on operational needs or contextual changes*)

Approved by: Joanne Lebert – Executive Director

Annex A –Whistleblower Reporting Form

This form is intended to support individuals in confidentially reporting serious concerns involving misconduct, unethical behavior, or potential violations of law, donor requirements, or organizational policies. While you are not required to complete every section, providing as much information as possible will help ensure a thorough and timely response.

CONFIDENTIALITY AND PROTECTION OF WHISTLEBLOWERS

IMPACT is committed to protecting whistleblowers and maintaining the confidentiality of all reports. You may submit this form anonymously. If you choose to identify yourself, your information will be treated with the highest level of discretion. IMPACT strictly prohibits any form of retaliation against individuals who report concerns in good faith.

1. Date of Submission:

2. Type of Report:

☐ Whistleblower (e.g., serious misconduct, fraud, corruption, abuse, or policy violation)

3. Do you wish to remain anonymous?

☐ Yes

☐ No

4. If not anonymous – Full Name (optional):

5. Your Role/Status:

☐ IMPACT Staff

☐ Consultant / Contractor

☐ Partner Organization

☐ Community Member / Beneficiary

☐ Other (please specify): _____

☐ Prefer not to say

6. Country, Location, and Project Name (if applicable):

Please indicate the country, specific site or region, and name of the project this report relates to.

7. Description of the Concern or Incident:

Provide a clear and detailed account of what happened, including key facts such as:

- *What occurred*
- *When (date and time, if known)*
- *Where it happened*
- *Who was involved (if known)**

8. Have you already raised this concern with someone?

☐ Yes ☐ No

If yes, who did you speak with? What was the outcome?

9. Supporting Documents (if any):

Please list and attach any relevant files such as photos, emails, reports, or witness statements.

10. Preferred Method of Contact (if not anonymous):

☐ Do not contact me

☐ Email: _____

☐ Phone: _____

☐ Other: _____

11. Do you require any support? (e.g., psychosocial, medical, legal assistance,)

☐ Yes

☐ No

If yes, please specify: _____

Please note: Support services (e.g., psychosocial, legal, or medical assistance) will be provided based on the seriousness of the case and the assessed needs. To receive support, you must provide contact information so that appropriate follow-up can be arranged confidentially.