



# WHISTLE BLOWER POLICY

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# WHISTLE BLOWING POLICY

## INTRODUCTION

The Whistle Blower Policy ("the Policy") is designed to encourage transparency and accountability within the organisation. It provides a secure and confidential avenue for co-workers, volunteers, donors, vendors, beneficiaries, and other stakeholders to report any unethical practices, misconduct, or violations of legal or organisational standards without fear of retaliation or discrimination.

## SCOPE

This Policy applies to all employees, volunteers, board members, donors, vendors, beneficiaries, and any other external stakeholders associated with the organisation. It ensures that everyone involved with the organisation has the right to raise concerns regarding:

- Financial mismanagement or fraud
- Corruption or bribery
- Harassment or discrimination
- Breach of legal obligations
- Endangerment of health and safety
- Any other unethical conduct

## REPORTING MECHANISM

All Protected Disclosures should be reported in writing by the Whistle Blower as soon as possible, but not later than 30 (thirty) working days after the Whistle Blower becomes aware of the same and should either be typed or written in a legible handwriting in English or Hindi.

The Policy provides a structured mechanism for reporting concerns. Stakeholders can report issues through multiple channels, including:

- **Email:** A dedicated email address for whistle-blower reports.
- **In-Person Reporting:** Direct reporting to a designated officer or committee within the organisation.
- Send hard copy complaint enclosed in an envelope marked as "Strictly Confidential" to:

To,  
President,  
Gramin Samaj Kalyan Samiti (GRASS)  
Talla Chinakhan, Almora  
Uttarakhand (263601)

All reports are treated with the utmost confidentiality, and the identity of the whistle-blower will be protected to the fullest extent possible.

## INVESTIGATION PROCESS

Upon receipt of a disclosure, the organization (referred to as GRASS) is committed to handling the matter promptly and professionally, following the procedures and timelines outlined below:

### 1. Preliminary Inquiry

- **Initial Assessment:** Within 7 working days of receiving a written complaint, the Whistle Committee will conduct a discreet preliminary inquiry to determine whether there is a basis for proceeding with a formal investigation. This inquiry is crucial to ascertain the validity of the disclosure and to decide the next steps.

### 2. Special Cases:

- **Child Protection or Sexual Harassment:** If the reported matter involves a violation of child protection or sexual harassment against women in the workplace, the relevant committees (such as the Child Protection Committee or Internal Complaints Committee) will be

immediately notified. The investigation will then proceed in accordance with the specific procedures outlined in the respective policies governing these areas.

### 3. Formation of Investigating Committee

- **Appointment:** If the preliminary inquiry establishes a basis for further investigation, the Whistle Committee will appoint appropriate members to form an "Investigating Committee." It is imperative that the appointed members have no conflict of interest related to the complaint.

### 4. Fact-Finding Investigation

- **Initial Meeting:** The Investigating Committee will begin by arranging a meeting with the whistle-blower to discuss the concern in detail and identify the available evidence.
- **Evidence Gathering:** The investigation may involve interviewing witnesses and reviewing relevant documents or other written evidence.
- **Protection of Whistle-Blower:** The investigation will typically avoid direct cross-examination or contact between the whistle-blower and the individual against whom the complaint has been made (the complainee). This precaution is to protect the whistle-blower from potential retaliation. If such contact is deemed necessary, the Investigating and Whistle Committees will take all necessary measures to safeguard the concerned parties.

### 5. Investigation Timeline

- **Completion:** The investigation must be completed within 90 calendar days from the receipt of the protected disclosure. If, due to special circumstances, more time is needed to conclude the investigation, the whistle-blower will be informed of the delay and the reasons for it.

### 6. Reporting

- **Submission of Report:** Upon the conclusion of the investigation, the Investigating Committee will compile a detailed case report. This report will be submitted to the Whistle Committee for review and further action as necessary.

## POST INVESTIGATION ACTIONS

Following the completion of an investigation, the organisation will undertake the following actions based on the findings:

### 1. Disciplinary Action

- **Implementation:** If the investigation concludes that an unethical or improper act has been committed beyond reasonable doubt, and there is sufficient evidence, appropriate disciplinary action will be initiated against the person concerned. This could include measures up to and including termination, depending on the severity of the violation, the nature of the complaint, and the evidence collected.

### 2. Reporting to Authorities

- **Escalation to Statutory Authorities:** In cases where grave wrongdoing is identified, the Whistle Committee will decide whether to report the matter to statutory authorities such as the Police Department, Child Welfare Committee (CWC), and/or relevant donors. Any criminal activity uncovered during the investigation will be reported to the police.

### 3. Mitigating Ongoing Risks

- **Risk Mitigation:** The organisation will take prompt and appropriate actions to mitigate any ongoing risks identified during the investigation. This includes measures to eliminate risks of harm to individuals or prevent financial losses. Additionally, any policy, procedural, or system errors or weaknesses identified will be corrected to prevent future occurrences.

### 4. Communication with the Whistle-Blower

- **Progress Updates:** The whistle-blower will be kept informed about the overall progress of the investigation.
- **Outcome Notification:** At the conclusion of the investigation, the whistle-blower will be informed of the overall outcome. However, detailed information about the actions taken may not be shared if it could breach the confidentiality of the individuals involved.

### 5. Final Decision and Appeal

- **Finality of Decision:** The decision made by the Whistle Committee is considered final and binding.

- **Appeal Process:** In exceptional cases where the whistle-blower is not satisfied with the outcome of the investigation or the decision made by the Whistle Committee, they have the right to raise the matter to the Board. The whistle-blower must outline the reasons for their dissatisfaction when appealing the decision.

## WHISTLEBLOWER ANONYMITY & PROTECTION

### 1. Anonymity of Whistleblowers

- **Encouraging Identifiable Disclosures:** The organisation does not encourage associates to make disclosures anonymously. Investigations may be significantly hindered if further information cannot be obtained, making it difficult to assess the credibility and intent behind the allegations. For this reason, organisation will not consider concerns raised anonymously.
- **Protection of Identity:** While anonymity is discouraged, Organisation is committed to protecting the identity of the whistleblower. If a whistleblower requests confidentiality, the organisation will take all reasonable measures to protect their identity, provided it does not interfere with the effective progression of the investigation.

### 2. Whistleblower Protection

- **Confidentiality:** The Organisation ensures the confidentiality of the whistleblower's identity and the details of the disclosure, as far as possible. This confidentiality will be maintained throughout the investigation process and beyond, except where disclosure is required by law.
- **Protection Against Retaliation:** The Organisation strictly prohibits any form of retaliation against whistleblowers. This protection covers all adverse actions, including termination, demotion, reduction in compensation, poor work assignments, and any form of threats or physical harm. Whistleblowers who believe they are facing retaliation should immediately report the issue to the Human Resources Head.
- **Scope of Protection:** While the Organisation offers strong protections for whistleblowers against retaliation, this protection does not grant immunity for any personal wrongdoing by the whistleblower that is discovered during the investigation. Additionally, if it is established that the whistleblower made a false allegation with malicious intent, they may face appropriate disciplinary action.

## CONFIDENTIALITY OF THE CONCERNED PARTIES

In the context of the Whistleblower Policy, GRASS is committed to maintaining the confidentiality of all parties involved in the investigation process. This includes:

- **Confidentiality Assurance:** The identities of all concerned parties, including the whistleblower and the complainee, will be kept confidential throughout the investigation process.
- **Restricted Disclosure:** Information regarding the identities of these individuals will not be disclosed to anyone outside of the investigating committee, the whistle committee, or any other person directly involved in the investigation.
- **Protection of Privacy:** Every effort will be made to ensure that the confidentiality of all parties is upheld, to protect them from any potential harm or retaliation and to maintain the integrity of the investigation process.

## GOOD FAITH

It is important that whistle-blowers raise concerns in good faith. Reports made with malicious intent or knowing them to be false may lead to disciplinary action against the reporting individual.

## COMPLIANCE WITH LEGAL OBLIGATIONS

This Policy is designed to complement and not replace any legal protections available to whistle-blowers under Indian law. The organisation recognises the importance of complying with all relevant legal and regulatory requirements, including the Whistle Blowers Protection Act, 2014, and any other applicable laws.

## **REVIEW AND AMENDMENTS**

The Policy will be reviewed periodically to ensure its effectiveness and compliance with legal standards. Amendments may be made as required to address emerging issues or changes in the regulatory landscape.

## **WHISTLE COMMITTEE**

The committee for Protected Disclosure will be as follows:

1. Founder & Board Member - Chairperson.
2. Two other board members as chosen specifically by the Founder basis the complaint reported - Members