



ACDI/VOCA WHISTLEBLOWER POLICY

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DOCUMENT CONTROL SHEET

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Author: Chief Legal Officer	Date: 1/19/2021	Division Name: President's Office
Ext. Number: 6181	Email: LPingel@acdivoca.org	
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1. PURPOSE

This ACDI/VOCA Group Whistleblower Policy is part of the policy framework that is dedicated to creating and maintaining a work environment that strives to uphold the highest ethical standards for our employees and all the people and companies our work impacts. The Whistleblower Policy describes ACDI/VOCA Group's commitment to that protecting individuals who, *in good faith*, report allegations of violations of ACDI/VOCA policies, relevant laws, or other concerns regarding proper legal and ethical behavior.

2. POLICY STATEMENT

ACDI/VOCA Group requires all ACDI/VOCA Group employees (affiliates, headquarters and field, expatriate and local) to report any information they reasonably believe in *good faith* violates ACDI/VOCA Group policies, and/or any relevant laws or regulations.

Through this policy we also require all of our implementing partners, subawardees, grantees, contractors, vendors and any of their employees, to report any information they reasonably believe in *good faith* violates ACDI/VOCA Group policies, and/or any relevant laws or regulations.

We also strongly encourage our donors, institutional partners as well as beneficiaries of our projects as well as anyone we interact with to report any information they reasonably believe in *good faith* violates any of our policies or any relevant laws or regulations.

To help secure and maintain workplace integrity, any individual who reports any suspected violations of laws or ACDI/VOCA Group policies shall be protected from and against any and all forms of organizational retaliation for having made or attempted to make a report to the maximum extent possible.

All reports of suspected violations from any source shall be received confidentially and may be made anonymously. Anyone seeking to make a report is encouraged to utilize the ACDI/VOCA Ethics System or Record (here). Reports will also be received by e-mail, phone, in person, or using any other method of contact found on our website: www.acdivoca.org. ACDI/VOCA Group employees may also use any means to contact their supervisor, any member of the Ethics Committee, or to the Chief Legal Officer.

Any employee determined to have obstructed or attempted to obstruct another employee from making a protected disclosure shall, along with any employee who retaliates in any way against an employee for having made or attempted to make such a disclosure, be subject to appropriate disciplinary action, up to and including termination.

3. SCOPE OF POLICY

This policy applies to all:

- ACDI/VOCA Group employees and the Board of Directors
- All ACDI/VOCA affiliates and their employees
- All Subrecipients, subawardees, subcontractors, volunteers, suppliers, grantees, and independent consultants.

4. ROLES AND RESPONSIBILITIES

The Chief Legal Officer (CLO) has the primary responsibility for maintaining this policy and ensuring procedures are developed to ensure that the policy is followed. ACDI/VOCA reserves the right to change or revise this policy, as appropriate. Material changes to this policy must be reviewed and approved by the CEO & President after review by the Executive Management Team and the ACDI/VOCA Ethics Committee.

Chiefs of Party, Country Representatives, and Division Heads are responsible for implementing and enforcing this policy in the projects they operate.

Supervisors should take all the necessary steps to ensure employees reporting to them know and follow this policy.

All ACDI/VOCA Group employees and other individuals covered by this Policy are required to cooperate with investigations and to report or seek advice about reporting how to appropriately handle potential violations of the Policy.

5. DEFINITIONS

“Good Faith” – means as a state of mind consisting of an honest belief in the facts being represented; a genuine and proper purpose in the presenting those facts; and an absence of intent to defraud or to seek improper or unethical advantage.

“Report” – means any report of suspected violation of a relevant policy, Federal, local or International law received from any source or system of the ACDI/VOCA Group involving an employee of ACDI/VOCA group or any other group, entity or individual covered by this policy.

6. POLICY PROCEDURES

In order to carry out this policy effectively, ACDI/VOCA shall implement this policy through:

1. Inclusion of this policy in the ACDI/VOCA Group Code of Conduct and Human Resources Manual.
2. Incorporation of the policy in on-boarding training for every Board Member and employee;
3. Requiring review and acknowledgement of this Policy part of annual training for all employees;
4. Inclusion of a requirement that all subaward and subcontract agreements issued by ACDI/VOCA Group to non-ACDI/VOCA entities either consent to follow this policy or that they implement substantially similar compliant policies;
5. Volunteers and Independent consultants will be provided with this Whistleblower policy;
6. Annual compliance monitoring;
7. Incident Reporting and investigation through the Ethics System of Record

7. EXCEPTIONS

As may be required by an individual funder/donor or in accordance with local laws, customs, and concerns for the safety of employees, beneficiaries, and related parties, local country offices may seek guidance from the Chief Legal Officer and Ethics Committee to develop variations of this policy that are sensitive to local concerns.

8. REFERENCES