

## Trinamul Unnayan Sangstha

### Whistle Blowing Policy



Trinamul Unnayan Sangstha

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General Secretary  
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Chairperson  
Trinamul Unnayan Sangstha

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### Whistle Blowing Policy

**Introduction:** It is vital that everyone who works for Trinamul Unnayan Sangstha(TUS) maintains the highest standards of conduct, integrity and ethics, and complies with national legislation. If an employee, volunteer, partner, consultant or contractor has any genuine concerns about malpractice in the workplace, TUS encourages them to communicate these without fear of reprisals or retaliation and in the knowledge that they will be **protected from victimization and dismissal**.

This policy does not form part of an employees' terms and conditions of employment and may be subject to change at the discretion of management.

#### 1. Purpose of the Whistle Blowing Policy

- 1.1 This policy covers the steps to take when an employee feels, s/he has identified or observed conduct in the organization that breaches or violate the Code of Conduct.
- 1.2 This policy provides a recognized means of raising concerns internally within the organization. As TUS employee and associates, they are usually the first to be aware of any malpractice, fraud, negligence, or illegality and they must be able to raise legitimate issues in an open and honest way without any fear.

#### 2. Why does TUS have a Whistle Blowing Policy

- 2.1 TUS is committed to establish a society based on the values of social justice, dignity, equity, diversity and freedom. To achieve the mission successfully TUS follows the Do No Harm approach, gender equality, inclusiveness, accountability and transparency. So that TUS very must careful or vigilant about the risks of harassments and other malpractices and fraud inside the organization. The TUS's Governing Committee and Senior Management Team(SMT) are therefore committed to hear any concern an associate of TUS may have relating to a serious risk to organization's values – in particular social justice, dignity, equity, diversity and freedom – such as a suspicion of harassment or fraud in relation to TUS employee or organization.
- 2.2 TUS intends to support, emphasize and complement practices of risk and compliance management in the existing ethics framework of the organization. It emphasizes and complements the TUS's grievance redressing system, the Code of Conduct and Safeguard Policy. And therefore has established an additional reporting mechanism for employees who become aware of wrongful conduct by TUS staff in violation of the following categories:
  - Financial wrongdoing including theft, bribery, fraud, money laundering and abetting terrorist activities
  - A failure to comply with any legal obligations



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- Sexual misconduct, including sexual abuse, harassment or exploitation
- Abuse or exploitation of children, vulnerable adults or beneficiaries
- Breach or violation of TUS policies in operation
- Abuse of position
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behaviour
- Activity which would bring the organisation into serious disrepute
- The deliberate concealment of information relating to any of the matters listed above.

### 3. What to Report

- 3.1 TUS needs to know about risks which immediately challenge organisation's vision and values. If an employee have information on such a risk or believe that wrongdoing may have occurred, has occurred, or could occur, requested to make sure it is known and follow the procedures below on how to report it.
- 3.2 While it is understood that the employee may want to seek further information or consult with colleagues before making a report, requested to avoid unnecessarily sharing the identity of individuals affected by his/her report to colleagues, undertaking his/her own investigations, or collecting evidence before contacting a responsible person. The goal of this policy is to help TUS address problems before or as soon as they arise. For that reason, it is important that a responsible person is advised of a concern quickly so that s/he can undertake a fair, impartial and prompt examination of matters brought to his/her attention.

### 4. Whistle Blowing Reporting Procedure

- 4.1 All individuals working under any form of contract or agreement with TUS, including full- and temporary employees, interns, contractors, volunteers, senior advisors and consultants(hereafter: associates), can use this policy to raise concerns about any of the issues mentioned above.
- 4.2 If any of the above mentioned believe, in good faith, that s/he has uncovered or observed evidence that indicates harassment/abuse, fraud, malpractice or any other breach or violate of the Code of Conduct, s/he is expected to report it, with the supporting factual evidence to:
- Gender focal person/HR Manager/Program Manager in TUS or, if the employee believes TUS Gender focal person/HR Manager/Program Manager is involved or implicated in any way, Executive Director. In cases of alleged harassment/abuse, one shall report these in the first instance to the designated person in TUS, who will advise the Executive Director.
  - If the complainant considers that his/her concern may not be taken seriously through this route, s/he may, alternatively go outside the line management structure and raise his/her concern with the Governing Board



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Members/designated external ombudsperson (contact details to be added once available).

4.3 Associates can voice their concern through the above channels or contact with designated officer through email address: [trinamulcht@gmail.com](mailto:trinamulcht@gmail.com) . Concern can also be dropped in written form in the suggestion box available at TUS office.

4.4 Complaints can be made on behalf of affected parties where necessary, but only with the affected party's proven consent.

### 5. Confidentiality and Anonymity

5.1 Confidentiality is assumed unless complaints agree that his/her identity may be revealed. In respect of allegations of sexual abuse, it is important to remember that the best interests of the victim are paramount. A breach of confidentiality could have devastating effects on the life of the victim and his/her family.

Nevertheless, employee's identity will not be revealed without prior written permission unless required to do so by law.

### 6. Assessment, Review or Investigation

7.1 All concerns raised under this policy will be dealt with promptly and will be treated seriously and sensitively.

7.2 Complaints concerns will be discussed with him/her in order to help determine the precise action to be taken. It will be for the manager with whom employee have raised the concern to decide whether or not to involve other parties to investigate (e.g. where there is an issue of alleged sexual abuse or fraud, an investigation must be carried out).

7.3 Whenever possible, resolution will be reached and the outcome known within 28 days of raising the concern. Employee will be informed of the action taken and the outcome.

7.4 If an employee has raised a legitimate concern in good faith and an investigation finds the concern to be unfounded no action will be taken against the employee for 'whistle blowing'.

### 7. Whistle Blower Retaliation

7.1 Retaliation is defined as any direct or indirect detrimental action recommended, threatened, or taken towards an individual who has reported a complaint under the whistle blowing policy.

7.2 TUS will not accept any retaliation against person(s) who have made complaints under this policy.

7.3 TUS will take appropriate measures to protect complaints from any form of retaliation, disadvantage or discrimination at the workplace linked to or resulting from his/her report.

7.4 TUS will enforce mandatory discipline against staff members and associates where retaliation is proven to have taken place.



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7.5 Anyone who makes false and malicious accusations or who raises concerns for personal gain will also be the subject of disciplinary action.

### 8. Review

9.1 Responsibility for overseeing compliance with this policy is with the Executive Director of TUS.

9.2 This policy has been approved by the TUS Executive Committee (EC). It will be reviewed annually for usability and efficiency, in consultation with TUS's Senior Management Team, and a representative from TUS staff and subject to EC approval whenever modified.

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TUS will not tolerate any form of coercion, intimidation, reprisal or retaliation against anyone who reports losses, illegal acts or violations of the Code of Conduct, or provides any information or other assistance in an investigation. Making frivolous claims will not be tolerated and may lead to corrective action up to and including immediate termination of employment.