



**IMRO**

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## IMRO WHISTLE BLOWING POLICY

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## **1. Introduction**

Ihorere Munyarwanda (IMRO) is a Non-Governmental Organization that was founded in 1999 and legally operating in Rwanda since 2002. It has 20 years of experience implementing interventions in the context of Poverty Alleviation, Gender Equality, Nutrition, GBV, HIV, Education, Environment, Peace Building, Health Promotion, accountability, Advocacy and Networking in order to improve lives of Rwandans Citizen at individual, family and, community levels for sustainable social economic development.

IMRO is committed to high standards of ethical conduct and accordingly places great importance on making clear any existing or potential conflict of interest.

## **2. Purpose**

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

## **3. Scope**

This policy applies to IMRO Executive, Officers, Project Managers, Employees, officers, consultants, contractors, casual workers and agency workers. This policy does not form part of any employee's contract of employment and it may be amended at any time.

#### **4. Definition**

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work.

This may include:

- Criminal activity;
- Breaches of Anti-corruption and Bribery Policies;
- Financial fraud or mismanagement;
- Failure to comply with any legal, professional or regulatory requirements;
- Danger to health and safety;
- Bullying, sexual or other harassment;
- Safeguarding concerns;
- Conflicts of interest;
- Breach of internal policies and procedures;
- Conduct likely to damage our reputation or financial wellbeing;
- Negligence;
- The deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above. If he or she has any genuine concerns related to suspected wrongdoing or danger affecting any of IMRO's activities (a whistleblowing concern), he or she should report it under this policy.

#### **5. Policy statement**

IMRO is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers. This policy outlines a

procedure for employees to report actions that an employee reasonably believes violates a law, or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter which is related to IMRO's business and does not relate to private acts of an individual not connected to the business of IMRO.

This policy should not be used for complaints relating to one's own personal circumstances, such as the way you have been treated at work. In those cases, you should use the anti- harassment and anti- bullying procedures as appropriate.

### **5.1. Assurance to staff**

All employees, officers, project managers, consultants, contractors, casual workers and agency workers should be assured that if they raise a genuine concern under this policy, they will not be at risk of losing their job or suffering any form of retribution as a result. It is understood that whistleblowers are sometimes worried about possible repercussions.

IMRO aims to encourage openness and will support those who in good faith raise a genuine concern under this policy, even if they turn out to be mistaken. However, if a staff member makes a deliberately false allegation, then they will not be protected by this policy. An example of a deliberately false allegation would be where an individual raises an allegation knowing it not to be true simply in order to cause harm to another colleague or in order to obtain some other advantage.

IMRO is committed to this policy and will adopt a zero-tolerance approach to the harassment or victimization of anyone raising a genuine concern. Whistleblowers will not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform the HR Director immediately. If the matter is not remedied staff should raise it formally using the anti- harassment or anti-bulling procedure.

We hope that everyone working for or with IMRO will feel able to voice whistleblowing concerns openly under this policy. However, if he or she wants to raise his or her concern confidentially, IMRO will make every effort to keep his or her identity secret. If it is necessary for anyone investigating his or her concern to know his or her identity, IMRO will discuss this with him or her.

IMRO will consider anonymous disclosures; however, an anonymous disclosure may make a proper investigation more difficult or impossible if IMRO cannot obtain further information from concerned person. It is also more difficult to establish whether any allegations are credible.

## **5.2. Applicability to specific cases**

If an employee has a reasonable belief that another employee or IMRO has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the employee is expected to immediately report such information to the National Coordinator. If the employee does not feel comfortable reporting the information to the National Coordinator, he or she is expected to report the information to the Human Resource Officer or to the Staff Representative.

All reports will be followed up promptly, and an investigation conducted. In conducting its investigations, IMRO will strive to keep the identity of the complaining individual as confidential as possible, while conducting an adequate review and investigation.

IMRO will not retaliate against an employee in the terms and conditions of employment because that employee:

- i. Reports to a supervisor, to the National Coordinator, the project manager, state or what the employee believes in good faith to be a violation of the law; or
- ii. Participates in good faith in any resulting investigation or proceeding, or (c) exercises his or her rights under any state or regulation(s) to pursue a claim or take legal action to protect the employee's rights.

IMRO may take disciplinary action (up to and including termination) against an employee who in management's assessment has engaged in retaliatory conduct in violation of this policy.

In addition, IMRO will not, with the intent to retaliate, take any action harmful to any employee who has provided to law enforcement personnel or a court truthful information relating to the commission or possible commission by IMRO or any of its employees of a violation of any applicable law or regulation. Supervisors will be trained on this policy and IMRO's prohibition against retaliation in accordance with this policy.

## **6. Investigation process**

Once a concern has been raised, the appropriate management will carry out an initial assessment to determine the scope of any investigation. IMRO will inform the concerned employee of the outcome of this assessment (unless the concern has been raised anonymously). You may be required to attend additional meetings in order to provide further information.

The investigation process will vary according to the circumstances of each case but will always seek to ensure that any concern raised is investigated thoroughly, promptly and confidentially. Depending on the circumstances, the investigation

may involve all staff at all level from Finance or Human Resource and if appropriate external support, for example, internal audit.

IMRO will aim to keep the concerned employee informed of the progress of the investigation and the outcome of the investigation will be reported back to him or her with as much detail as is proper and reasonable to the case. However, sometimes the need for confidentiality may prevent IMRO giving him or her specific details of the investigation or any disciplinary action taken as a result. He or she should treat any information about the investigation as confidential.

## **7. External disclosures**

The aim of this policy is to provide an internal mechanism for reporting, investigating and dealing with any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

IMRO encourages everyone to seek advice from a senior member of staff before reporting a concern to anyone external. Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes concern a third party, such as a donor, customer, supplier or service provider. However, IMRO encourages everyone to report such concerns internally first, either directly to IMRO management or to the independent reporting service.



## **8. Roles and responsibilities**

### **8.1. Employees**

All employees are responsible for:

- i. complying with this policy;
- ii. in particular, with the requirement not to threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

### **8.2. Project managers**

In addition to their responsibilities as employees, project managers are responsible for:

- i. implementing this policy and related processes;
- ii. working closely with Human Resource department to investigate any whistleblowing concerns, as required, and to implement any identified changes within their work area;
- iii. supporting any whistleblower in their work area and ensuring that they are appropriately treated by colleagues and others.

### **8.3. Human Resource Officer**

HR is responsible for:

- i. providing appropriate guidance and training to Project managers to support the implementation of this policy;
- ii. providing support to investigations and any required Human Resource support during or following an investigation;
- iii. working with third parties in the effective implementation of this policy;

iv. monitoring the effectiveness of this policy, through anonymous surveys, analysis of Human Resource data and other appropriate means, and to keep under review procedures and criteria in the implementation of the policy, in discussion with IMRO management and employee.

**Aimable MWANANAWA LLB, MIRD**

**IMRO National Coordinator**



**Flavienne NDAYISHIMYE**

**Legal Representative**

A handwritten signature in blue ink, consisting of stylized, overlapping letters and lines.