

**Rotary**  
District 9212



**DISTRICT 9212**  
**WHISTLEBLOWING POLICY**  
**APRIL 2024**

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## ROTARY MOTTO

Service Above Self

## ROTARY VISION STATEMENT

Together, we see a world where people unite and take action to create lasting change — across the globe, in our communities, and in ourselves.

## ROTARY CORE VALUES

Fellowship

Integrity

Diversity

Service

Leadership

## THE FOUR-WAY TEST

Of the things we think, say or do:

- 1) Is it the TRUTH?
- 2) Is it FAIR to all concerned?
- 3) Will it build GOODWILL and BETTER FRIENDSHIPS?
- 4) Will it be BENEFICIAL to all concerned?

## OBJECT OF ROTARY

The Object of Rotary is to encourage and foster the ideal of service as a basis of worthy enterprise and, in particular, to encourage and foster:

**First:** The development of acquaintance as an opportunity for service;

**Second:** High ethical standards in business and professions; the recognition of the worthiness of all useful occupations; and the dignifying of each Rotarian's occupation as an opportunity to serve society;

**Third:** The application of the ideal of service in each Rotarian's personal, business, and community life;

**Fourth:** The advancement of international understanding, goodwill, and peace through a world fellowship of business and professional persons united in the ideal of service.

## **ROTARY COMMITMENT TO DIVERSITY, EQUITY, AND INCLUSION (DEI)**

At Rotary, we're committed to treating everyone with dignity and respect, allowing everyone's voice to be heard, and providing equitable opportunities for fellowship, service, and leadership.

Our members want and expect Rotary to be a diverse, equitable, and inclusive organization. Although the Rotary experience may differ from country to country, issues of diversity, equity, and inclusion are globally relevant.

We embrace the principles of diversity, equity, and inclusion. We recognize that being a diverse, equitable, and inclusive organisation will enhance the experience that members have in Rotary, allow us to carry out more meaningful and effective service efforts, and create open, welcoming environments that appeal to people who want to connect with us.

## **ABBREVIATIONS**

WP – Whistleblowing Policy

DWB – District 9212 Whistleblowing Policy

FWT – Four Way Test

G&E – Governance & Ethics

DG – District Governor

## DEFINITION OF TERMS

- Complaint:** An allegation or concern that is subject to investigations by the District 9212 or an appropriate authority.
- Detriment:** Victimization or reprisal of a whistleblower which can take any or a combination of the following forms; dismissal, termination, undue influence, duress, withholding of benefit and/or entitlements and any other act that has negative impact on the whistleblower.
- Good Faith:** This is evident when a report or concern is made without malice or consideration of personal benefit and the person making the complaint has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.
- Investigation:** A process designed to gather and analyse information in order to determine whether misconduct has occurred and if so, the party or parties responsible.
- Misconduct:** A failure by any Rotarian or other relevant stakeholder to observe the rules of conduct or standards of behavior prescribed by Rotary or any written law, by-law, rule and regulation.
- Suspect:** A person who is alleged to have committed a misconduct and subject of investigation.
- Whistleblower:** Any person(s) and entity including Rotarians, Rotaractors, Interactor, Management, Directors, service providers and other stakeholders of the DWP, who report any form of unethical behaviour or dishonesty to the appropriate authority.
- Whistleblowing:** The act of reporting an observed/perceived unethical misconduct of Rotarians, Rotaractors, Interactors, Management, Directors and other stakeholders of the DWP by an or other person to

appropriate authority. It is an early warning system that enables District 9212 to find out when something is going wrong in time to take necessary corrective action where appropriate and applicable.

## 1.0 INTRODUCTION

The purpose of District 9212 Whistleblowing Policy (WP) is to provide Rotarians and any well meaning persons and entities with a platform unto which they can find safety and security to provide information to the relevant Rotary leadership and or offices regarding issues about suspected or actual wrongdoing, unethical, illegal acts or malpractice within the District without fear of being victimized, discriminated upon or disadvantaged in any way.

This policy guarantees whistleblowers that their effort will not be in vain, that confidentiality will be respected and that impartial and professional investigations will be conducted irrespective of the socio-economic and cultural status of the Rotarians / personalities mentioned. The District 9212 Whistleblowing Policy (DWP) encourages anyone who has serious concerns about any aspect of the District activities to voice those concerns without fear of victimization, subsequent discrimination or disadvantage. District 9212 in ensuring a high ethical standard in all its activities has established a Governance and Ethics Policy which sets out the standard of conduct expected in the management of its businesses across. All Rotarians and stakeholders are expected to comply with these standards in the discharge of their duties.

### 1.1 SCOPE

- i. This Policy designed to enable Rotarians and other relevant stakeholders to report any perceived act of impropriety. These acts should not be based on mere speculation, rumors and gossip but on knowledge of facts. The whistleblower should exercise high level of objectivity, sobriety and the ideals of the Four Way Test (FWT) while reporting. Reportable misconducts covered under this Policy include: -
  - a) All forms of financial malpractices or impropriety such as fraud, corruption, bribery, money laundering, theft and concealment;
  - b) Failure to comply with legal obligations, statutes, and regulatory directives;



- c) Actions detrimental to Health and Safety or the work or any event environment;
  - d) Any form of criminal activity;
  - e) Improper conduct or unethical behavior that undermines universal and coreethical values such as integrity, respect, honesty, accountability and fairness;
  - f) All forms of Governance and Ethics (G & E) breaches;
  - g) Connected transactions not disclosed or reported in line with Rotary Ideals, Constitution, By Laws, or Regulations;
  - h) Insider Abuse;
  - i) Non-disclosure of interests and Conflict Of Interest;
  - j) Sexual or physical abuse of anyone including but not limited to Rotarians, Rotaractors, Interactors, service providers , community members, partners and other relevant stakeholders; and
  - k) Concealment or attempt to conceal any of the above listed acts.
- ii. The above listed reportable misconducts or concerns are not exhaustive. However, judgment and discretion is required to determine misconduct that should be reported under this policy. The general guide in identifying reportable misconduct is to report concerns which are repugnant to the interest of the District 9212 and the general public and appropriate sanctions applied.

## 1.2 OBJECTIVES

The District 9212 Whistleblowing Policy is intended to encourage Rotarians and other relevant stakeholders to report perceived unethical or illegal conduct of Rotarians, Officers, Directors and other stakeholders across District 9212 to appropriate authorities in a confidential manner without any fear of harassment, intimidation, victimization or reprisal of anyone for raising concern(s) under this Policy.

Specific objectives of the Policy are:

- i. To ensure all Rotarians feel supported in speaking up in confidence and

reporting matters they suspect may involve improper, unethical or inappropriate conduct within District 9212;

- ii. To encourage all improper, unethical or inappropriate behavior to be identified and challenged at all levels of District 9212;
- iii. To provide clear procedures for reporting and handling such concern(s);
- iv. To proactively prevent and deter misconduct which could impact the financial performance and damage the reputation of District 9212;
- v. To provide assurance that all disclosures will be handled seriously, treated as confidential and managed without fear of reprisal of any form; and
- vi. To help promote and develop a culture of openness, accountability and integrity.

### **1.3 GUIDING PRINCIPLE**

The guiding principle of District 9212 Whistleblowing Policy shall be in line with the Rotary International Constitution, whereby the District 9212 recognizes that all Rotarians have a right to express their opinion on any situation or issue concerning their area of responsibility. This right of expression entitles them to be heard without fear of recrimination or reprisal.

### **2.0 ADMINISTRATION OF THE POLICY**

- i. The Policy shall be administered by the Governance and Ethics Committee (GEC) of District 9212 who shall where appropriate, appoint an ad hoc committee to investigate matters that have been brought to the attention of the District 9212 through the whistle blowing mechanism.
- ii. The role and responsibility of the key parties in the whistleblowing process shall be as follows:

S/N	RESPONSIBLE OFFICER	RESPONSIBILITIES
1.	Whistleblower	Expected to act in good faith and should refrain from making false accusations when reporting his/her concern(s). Should also provide further evidence at his/her disposal to aid investigation of the issues reported.
2.	Suspect	Has a duty to cooperate with investigators during the period of investigation including provision of relevant information, documents or other materials as may be required by the investigator (s).
3.	Investigator (s)	Expected to handle all matters with high professionalism, confidentially, promptly and shall be independent and unbiased in carrying out investigation. The investigator shall provide to the Chairperson of Governance and Ethics a report of the investigation including the result of the investigation. The investigator(s) shall refrain from discussing or disclosing matters under investigation.
4.	Chairperson Governance And Ethics	Once investigations are complete, the Chairperson of Governance and Ethics shall handle the report of investigation in line with District 9212 G&E Policy and other guiding Documents. The Chairperson shall share the report with District Governor for any appropriate action.
5.	The District Governor	The District Governor (DG) through the Chairperson Governance and Ethics Committee shall make available to the Exco quarterly reports submitted by the GEC on whistleblowing, and also treat all whistleblowing concern(s) brought to the attention of the committee with confidentiality and speedy resolutions.

### 3.0 WHISTLEBLOWING PROCEDURE

The whistleblowing procedure involves steps that should be taken by the whistle-blower in reporting misconduct, and steps required for the investigation of the reported misconduct. The following procedures shall guide the whistle blowing process:

### 3.1. INTERNAL WHISTLEBLOWING PROCEDURE

Internal whistleblowing involves Rotarians across District 9212 raising concerns about unethical conduct. Any internal whistle-blower that feels victimized can report his/her grievance(s) to the Governance and Ethics Committee. This is without prejudice to the fundamental right of the internal whistle blower to seek redress in the court of law.

The following procedure shall be adopted for the purpose of internal whistleblowing:

#### **Step One: Raising Concern(s) by Whistle-Blower**

- i. An internal whistleblower may raise concern through any of the following media (this can be done in confidence/ anonymously):
  - a. Formal letter to the Chairperson Governance and Ethics Committee or to the District Governor.
  - b. Dedicated phone number/ communicator [REDACTED]
  - c. Dedicated email address [REDACTED]
  - d. Via District 9212 website: [REDACTED].com/whistleblowing.
- ii. Where the concern is received by any Rotarian other than the Chairperson Governance and Ethic or the District Governor, the recipient of such concerns shall be required to;
  - a. Immediately pass the concern to the Chairperson Governance and Ethics.
  - b. If the concerns affect the Chairperson Governance and Ethics (DG will be informed) or the District Governor, the Chairman of the Governing Council [REDACTED] shall be notified; and where the Chairman of the Governing Council is involved, such concern shall be directed at the DG.
- iii. The concern(s) shall be presented in the following format;
  - a. Background of the concerns (with relevant dates).

- b. Reason(s) why the whistleblower is particularly concerned about the situation.
- iv. Disciplinary measures in line with the Governance and Ethics Policy shall be taken against any Rotarians that receives concerns and fails to escalate. Disciplinary measure shall also be taken against an internal whistleblower who acted out of malice.

**Step Two: Investigation of Concerns and Update on Progress of Investigation.**

- i. The Chairperson Governance and Ethics shall upon receipt of the concern(s) acknowledge receipt of the concern from the whistleblower within 7 working days, and immediately commence investigation. The purposes of investigation are to:
  - a. Establish if a wrongdoing has occurred based on the concern(s) raised, and if so to what extent; and
  - b. To minimize the risk of further wrongdoing, prevent any further loss of assets, damage reputation of District 9212 and protect all sources of evidence.
- ii. If the preliminary inquiry shows that the concern falls within the whistleblowing reportable concerns, then further investigation shall be carried out. If otherwise or the concern is outside the reportable misconduct, then the Governance and Ethics Committee shall refer the matter to District Governor for further action.
- iii. If the concern raised by the whistleblower is found to be frivolous or unwarranted, the Chairperson Governance and Ethics Committee shall reject the complaint in writing. If necessary disciplinary measure in line with this Policy shall apply to Rotarians that raise concern out of malice.
- iv. Where it is established that a criminal activity has taken place, the matter may be referred by the complainant to the appropriate legal authority.

**Step Three: Report of Investigation and action on report.**

- i. Upon conclusion of investigation, the Chairperson Governance and Ethics Committee shall ensure that the report is discussed by the Governance and Ethics Committee. Chairperson Governance and Ethics Committee shall ensure that the District Governor is kept abreast of developments in whistleblowing.
- ii. All disciplinary action relating to the report shall follow Rotary

disciplinary procedures.

**Step Four: Non-Satisfaction with result of investigation/action**

In the event that the whistleblower is not satisfied with the extent of investigation and or the action taken based on the outcome of the investigation, the whistleblower is at liberty to report to the District Governor once. (Strong QA process – screening process / investigation process / advisory process – 3 separate teams or mix up the teams)

**3.3 TIME LIMIT FOR INVESTIGATION**

- i. It shall be the policy of District 9212 to handle investigations promptly and as fairly as possible even though it might not be possible to set a specified time frame for the conclusion of investigation, since the diverse nature of potential concerns may make this impracticable.
- ii. The Chairperson Governance and Ethics Committee shall endeavor to resolve all concerns within three (3) months. Where for any reason, proper resolution is unable to be achieved within this time frame; the Chairperson Governance and Ethics Committee shall advise the District Governor accordingly.

**3.4 PROTECTION OF WHISTLEBLOWER**

- i. It shall be the Policy of District 9212 to protect whistleblowers who disclose concerns, provided the disclosure is made:
  - a. In the reasonable belief that it is intended to show malpractice or impropriety;
  - b. To an appropriate person or authority; and
  - c. In good faith without malice or mischief.
- ii. While all disclosures resulting from whistleblowing shall be treated with high level of confidentiality, Rotarians and other relevant stakeholders are encouraged to disclose their name to make the report more credible. District 9212 shall take the following into consideration in considering anonymous disclosure:
  - a. Seriousness of the issues being reported;
  - b. The significance and credibility of the concern; and

- c. The possibility of confirming the allegation.
- iii. District 9212 shall not subject a whistleblower to any detriment. Where a whistleblower feels they have been subject to retaliation by their club owing to his/her whistleblowing actions, the whistleblower shall be at liberty to report to the District Governor. This is without prejudice to the right to take appropriate legal action.
- iv. Any retaliation, including, but not limited to, any act of discrimination, reprisal, harassment, suspension, dismissal, demotion, vengeance or any other occupational detriment, direct or indirect, recommended, threatened or taken against a whistleblower because he/she has made a disclosure in accordance with this Policy will be treated as gross misconduct and dealt with accordingly.
- v. Whistleblowers must ensure that they do not make disclosure outside of the prescribed channels (e.g. media-print or electronic), or their disclosures may not be protected.

## **4.0 POLICY IMPLEMENTATION**

### **4.1 IMPLEMENTATION Date**

- i. This Policy takes effect on the date it is approved by the District Assembly.
- ii. The Chairperson Governance and Ethics Committee is responsible, in consultation with Governance and Ethics Committee, for ensuring that this Policy is distributed and complied with.

### **4.2 MONITORING AND EVALUATION**

- i. District 9212 shall conduct monitoring and evaluation of the effectiveness of this Policy in line with the Monitoring, Evaluation and Reporting framework.
- ii. The Governance and Ethics Committee shall:
  - a. Develop and maintain strategies and mechanisms for monitoring and evaluation of this Policy.
  - b. Undertake regular check on implementation of the Policy.
  - c. Carry out annual evaluation on the implementation of the Policy.

- d. Use the information for planning and management.
- e. Propose potential areas for review.

### 4.3 REVIEW

The Policy will be reviewed after every three (3) years or earlier as need arises with an aim to enhance efficient delivery of effective outcomes.

### APPROVAL

<b>Title</b>	:	Whistle Blowing Policy
<b>Contact</b>	:	District Governor
<b>Approval Authority</b>	:	Exco
<b>Commencement Date</b>	:	May 2024

*SIGNED*

Name

Date

Designation – District Governor