

## HAI Safeguarding and Whistleblower Protection Policy

Humanitarian Aid International (HAI) requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of HAI, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Policy statement**

Receiving feedback and responding to complaints is an important part of improving Humanitarian Aid International [HAI]'s accountability. Ensuring our stakeholders can hold us accountable will improve the quality of our work in all areas.

### **Scope**

This policy applies to HAI and is global in its application. A complaint can be made by any supporter, partner organisation, community or individual with whom we work, or any member of the public whether an individual, company or other entity, in India or anywhere else in the world.

### **Definitions**

#### **1. Complaint:**

A complaint is an expression of dissatisfaction about the standards of service, actions, or lack of action, by HAI or its staff and associated personnel<sup>1</sup>. It is a criticism that expects a reply and would like things to be changed. A complaint has to be about some action for which HAI is responsible or is within our sphere of influence. Complaints could include the following (which is not an exhaustive list):

- Concern from someone we work with about the quality of programme delivery.
- Concern from a member of the public or supporter about a particular fundraising approach or campaign action.
- Concern about the behaviour of staff or associated personnel.

A complaint is **not**:

- A general inquiry about HAI's work
- A request for information
- A contractual dispute
- A request to amend records e.g., to correct an address, cancel a donation
- A request to unsubscribe from any service of HAI e.g., a campaign newsletter or email

The complaints procedures do not apply to complaints that are subject to current investigation by any regulatory body or other legal or official authorities in India or other countries in which we operate. Such issues will be dealt with by the relevant regulatory body.

#### **2. Whistleblower:**

A whistleblower is any person who reports concerns about unethical, illegal, or inappropriate behaviour in good faith. Whistleblowers are typically employees, volunteers, partners, or

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<sup>1</sup> Contractors, suppliers, volunteers etc.

community members who bring attention to issues such as fraud, corruption, abuse, or violations of policies or laws.

### 3. Designated Complaints Officer

The Designated Complaints Officer is the HAI HR & Compliance Officer or another assigned individual responsible for:

- Receiving, investigating, and resolving complaints.
- Ensuring complaints are acknowledged and handled in a timely and impartial manner.
- Reporting safeguarding or whistleblower complaints to the CEO or Board as appropriate.

### Procedures for making a complaint

It is hoped that most complaints or concerns about HAI's work or behaviour can and will be dealt with informally by staff or volunteers at a local level. However, it is recognised that not all issues can be resolved in this way and that a formal complaints mechanism is required for those occasions when an individual or organisation wishes to make their complaint a matter of record and to receive a formal response. All formal complaints should be made in writing either directly from the individual or organisation making the complaint or via someone acting on their behalf. Anonymous complaints will also be accepted and investigated to the extent possible. See below for details about to whom to address a complaint.

**1. Internal Reporting:** Employees and volunteers should first report concerns to their immediate supervisor. If unresolved or inappropriate to report to the supervisor, concerns may be raised with:

- **Designated Complaints Officer:** Via email at [complaints@hai-india.org](mailto:complaints@hai-india.org) or in writing to the administrative office.
- **CEO or Board of Directors:** For concerns involving the Complaints Officer or other senior management. Complaints against the CEO should be directed to the Board.

**2. External Reporting:** Members of the public, partner organizations, and other stakeholders can report concerns through:

- **Email:** [complaints@hai-india.org](mailto:complaints@hai-india.org)
- **Postal Address:** A12, Malkoti Apartments, MBR Enclave, Dwarka, Sector 23, New Delhi – 110077.

### Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

### Procedures for Handling Complaints

#### 1. Acknowledgment and Investigation

- **Acknowledgement:** All complaints will be acknowledged within **5 working days** of receipt by the Complaints Officer.

- **Investigation:** Complaints will be investigated promptly and impartially, with a resolution provided within **30 working days**, unless exceptional circumstances require additional time. If investigations cannot be concluded within 30 working days, the complainant will be informed of the delay and provided with an updated timeline for resolution.

## 2. Investigation Process

- **Safeguarding Complaints:**
  - **No Retaliation:** HAI prohibits retaliation against any individual who reports a concern in good faith. Employees, volunteers, or community members who face retaliation for reporting concerns or violations will be subject to disciplinary action, including termination.
  - **Confidentiality:** Whistleblower reports and safeguarding complaints will be kept confidential to the extent possible, consistent with the need for an adequate investigation. The identity of the whistleblower or complainant will be protected unless disclosure is required by law.
- **Ethical Violations and Financial Improprieties:** Investigated by the Complaints Officer under CEO supervision or escalated to CEO / HAI Board as needed.
- **Handling Violations:** All complaints and reports will be investigated promptly and impartially. If a report is substantiated, appropriate corrective action will be taken.
- **Retention of records:** All complaint records will be securely retained for a minimum of five years, in line with HAI's data protection and privacy policies.

## 3. Reporting to the Board

- The Complaints Officer will report all safeguarding and whistleblower complaints to the Board within **14 days** of receipt.
- The Board will review investigation findings and oversee corrective actions.

## Roles and Responsibilities

### 1. Complaints Officer

- Acknowledge complaints and ensure timely investigation and resolution.
- Notify the Board within 14 days of receipt of the complaint.
- Maintain secure records of complaints and outcomes.
- Provide quarterly summaries of complaints and resolutions to the Board
- Provide annual training sessions for employees, volunteers, and partners on the Safeguarding and Whistleblower Protection Policy to ensure effective implementation.

### 2. CEO

- Oversee investigations and ensure policy compliance.
- Notify the Audit/Finance Committee of financial complaints and collaborate on resolutions.
- Report annually to the Board on compliance activities.

### 3. Audit/Finance Committee

- Review financial complaints and ensure corrective actions.
- Submit investigation findings to the Board within **30 days** of notification.

## Training and Awareness

HAI will conduct mandatory training sessions annually for all staff, volunteers, and partners on safeguarding, whistleblowing, and complaint handling procedures. These sessions will include case studies and role-playing to enhance understanding and preparedness.

### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that HAI can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of HAI's code of ethics suspected violations of laws or regulations that govern HAI's operations, or concerns of corruption and bribery.

### **Policy Review and Finalization**

- **Date of Last Review:** 26 December 2024
- **Date of Finalization:** 26 December 2024
- **Reviewed and Approved By:** Programme Committee - HAI Board
- **Next Review Date:** 01 April 2025