

Whistleblower Policy & Procedures

I. Introduction

Mercy Hands requires all its staff, Board members, sub-contractors and volunteers practice honesty and integrity and comply with all organizational and national laws and regulations. However, situations of serious malpractice or misconduct may arise, herein referred to as “concerns.”

Such situations include:

- Sexual harassment or abuse (please refer to the separate PSEA Policy)
- Corruption, bribery or fraud
- Criminal activity
- Endangering the safety of others
- Willfully causing damage to MH activities, assets or reputation

The objectives of this Whistleblower Policy are to establish procedures for:

- The reporting of concerns by employees and other stakeholders of the organization
- The receipt and investigation of concerns
- The protection of those reporting concerns from retaliatory actions

Note: For any abuses of power or misconduct of staff against beneficiaries, please contact the MEAL Manager Bethany Schmid at +964.773.544.5542 or bethany.schmid@mercyhands.org.

II. Reporting Responsibility

Each staff member of Mercy Hands has a right and a duty to report, *in good faith*, any suspicion of malpractice, where “good faith” means a disclosure is made with honest intentions, without malicious reasons nor spite. The reporting process shall be in accordance with the procedures described in this policy.

III. Reporting Procedures

MH staff should first discuss their concern with their immediate supervisor, Regional Coordinator, or General Administrator, who should then inform the Executive Director. If the individual is not comfortable approaching their immediate supervisor, Regional Coordinator, or the General Administrator, or suspects that they are involved, or if he/she is not satisfied with the action taken by them, then the concern should be reported to the Executive Director. If the

Executive Director is believed to be involved in the malpractice, the individual should report directly to the Chairman of the Board of Directors.

The whistleblower should never contact the suspected offender directly, nor discuss the issue with any other staff members, nor anyone outside the organization.

The report must be made in writing and include as much detail as possible - where, when, who, what, any supporting evidence or extra information available.

Contact information:

1- Executive Director:

Dr. David Elkins

Phone: +964 750 326 7197

Email: david.elkins@mercyhands.org

2- Chairman Board of Directors:

Dr. Khaldoon Al-Moosawi

Phone: +1 405 501 7835

Email: director@mercyhands.org

IV. The Investigation Process

The Executive Director advises the MEAL Manager that a concern has been reported, and together they shall form a committee which will be responsible for the investigation process. This committee will consist of a member of the BoD, a member of the Executive Administration, and a relevant member of staff. No member of the investigation team shall have any previous involvement in the case, nor any conflict of interest with those involved and/or the possible outcomes. The whistleblower should agree on the members of the committee.

All reported concerns must be investigated immediately. The Committee will investigate the reports, collecting evidence and interviewing relevant people. The investigation should be as fair as possible, discrete, respect everyone's confidentiality and integrity, and attempt at all times not to jeopardize evidence. The MEAL manager is responsible for ensuring that the investigation process is carried out according to procedure.

A decision should be reached within twenty (20) business days, unless more time is required for external audits, etc. The MEAL Manager will keep a database with these reports, including the date reported, actions taken, the resolution, and the date of resolution.

V. Confidentiality

Reports of Whistleblowing, and investigations pertaining to them, *must* be kept confidential, in order to ensure staff safety, as well as to conduct an unbiased investigation. Disclosure of concerns or the identity of the whistleblower to anyone other than the investigation committee will be viewed as a serious disciplinary offense and will bear consequences, up to and including termination of employment.

VI. Action Taken

Once a decision is reached, appropriate corrective action should be taken immediately. This action must include follow-up with the whistleblower, for complete closure.

The necessary action should also be taken to prevent this type of malpractice or misconduct from recurring within the organization.

Allegations that prove to have been made maliciously, recklessly, or with the foreknowledge that they are false, will be viewed as a serious disciplinary offense and may result in suspension or termination of employment.

VII. Retaliation

This Whistleblower Policy is intended to encourage and enable staff to raise concerns without fear of retaliation. No staff member or stakeholder who, in good faith, reports a concern, shall be subject to retaliation or adverse employment consequences. A director or employee who retaliates against someone who has reported a concern shall be subject to disciplinary action, up to and including demotion or termination of employment.