



WHISTLEBLOWER POLICY-2020

OPHCD

Organization for Promotion of Health & Community Development



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OPHCD-WHISTLEBLOWER POLICY

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ABOUT OPHCD:

INTRODUCTION AND LEGAL STATUS

Organization for Promotion of Health & Community Development (OPHCD) is a non-government, non-profit, non-political, impartial and independent organization registered with:

- The NGOs Department of the Ministry of Economy of the Government of Islamic Republic of Afghanistan with license No 4160.

The organization established to serve the community and advocate for better coordinating and directing the available resources and activities for provision of quality services to the communities with an equitable manner. OPHCD, as a non-governmental organization committed for a joint mission with having dedicated and expert staff in public health, Water Sanitation and Hygiene, education, community development as well as volunteers who have been working in technical and managerial positions with national and international NGOs since more than one and half decade.

The members of the Board of Directors, senior Management Team (SMT) as well as the volunteers of the organization having appropriate experience, dedication and voluntarism which is a professional contribution to the health, education and development sector for achieving of more sustainable results. The core staff of OPHCD have more than one and half decade of successful experience of being directly involved in **developing** different policies and strategies as well as **designing** and **implementation** of projects in the areas of health, WASH, education and community development sectors such as; Primary Health care (PHC), Basic Package of Health Services (BPHS), Essential Package of Health Services (EPHS), Water & Sanitation and Hygiene, Primary education and Literacy programs, youth awareness and development, Public Nutrition, emergency preparedness and response and disaster risk reduction, trainings and coordination of different humanitarian Aids. Furthermore, the SMT and core Technical, Administration and Finance staff of the organization have up to date knowledge and rich experience of Grant Management, Project Management as well as conducting professional tasks of supportive Supervision, Monitoring, Evaluation, and Researches. Likewise, developing and on-time reporting (monthly, quarterly, annual, end of project and ad-hoc reports) to the donors and stakeholders, presenting the results of the aforementioned programs at the community, organizational, national and international levels are the expertise of the organization's technical and administrative staff.

VISION

An empowered society with sustainable and self-reliance health, social and economic stability at the community level.

MISSION STATEMENT

OPHCD, as a non-governmental organization is striving for well-being of the society with promotion of health and sustainable development of the communities through advocating for better coordinating and directing the national policies and strategies as well as available resources and activities for provision of quality health, educational, social safety, human right and social welfare, economic, environmental and development services to the communities with the focus on the women and children, drugs users, IDPs and other marginalized group of the society with an equitable manner.

PURPOSE

This policy is intended to encourage Board members, staff (paid and volunteer), contractors, subcontractors and others to report suspected or actual occurrence of illegal, unethical, sexual-abusing or inappropriate events (behaviors or practices) without retribution.

- ✓ The Whistleblower should promptly report the suspected or actual event to his/her supervisor.
- ✓ If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her supervisor, then the Whistleblower could report the event to the next highest or another level of management, including to an appropriate Board committee or member.
- ✓ The Whistleblower can report the event with his/her identity or anonymously.
- ✓ The Whistle blower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the organization.
- ✓ A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board or employee relationship, or other legal means to protect the reputation of the organization and members of its Board and staff.
- ✓ Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination of Board or employee status.
- ✓ Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel.
- ✓ Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.
- ✓ The Whistleblower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue.
- ✓ If the investigation of a report, that was done in good faith and investigated by internal personnel, is not to the Whistleblower's satisfaction, then he/she has the right to report the event to the appropriate legal or investigative agency.
- ✓ The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

SCOPE

This policy applies to any person who is, or has been, any of the following with respect to OPHCD:

1. Employee;
2. Officer;
3. Director;
4. Contractor (including sub-contractors and employees of contractors);
5. Supplier (including employees of suppliers);
6. Consultant;
7. Auditor;
8. Associate; and Relative, dependent, spouse, or dependent of a spouse of any of the above.

This policy is intended to apply to the above persons in all countries in which the OPHCD operates.

WHISTLEBLOWING OF SEA

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc

OPHCD Whistleblower Reporting Mechanism

(How staff, partners, and beneficiaries can safely report concerns)

The OPHCD is committed to transparency, accountability, and zero tolerance for fraud, corruption, abuse, or misconduct. The Whistleblower Reporting Mechanism ensures that employees, volunteers, contractors, and community members can safely report any concerns without fear of retaliation.

1. What Can Be Reported?

The following concerns should be reported through the whistleblower mechanism:

- Fraud, corruption, or misuse of funds
- Violation of OPHCD policies or donor regulations
- Abuse of authority or conflict of interest
- Harassment, exploitation, or abuse (including PSEA – Protection from Sexual Exploitation and Abuse)
- Health and safety violations
- Any unethical or illegal behavior

2. Who Can Report?

- OPHCD employees
- Consultants and contractors
- Beneficiaries and community members
- Partners and suppliers

Reports may be made anonymously or openly.

3. How to Report (Reporting Channels)

OPHCD provides multiple safe and confidential channels:

A. Email Reporting



Dedicated whistleblower email address (example):

whistleblowing.opbcd@gmail.com.

B. Telephone Hotline

A confidential hotline number may be used to report urgent or sensitive concerns.

C. Direct Reporting to the Whistleblower Committee

Report directly to:

- Compliance Department
- Internal Audit Unit
- Senior Management, if safe to do so

D. Physical Drop Boxes

Secure complaint boxes at office or field sites for anonymous reporting.

E. On-site Focal Points

Designated Whistleblower Focal Points can receive reports confidentially.

4. What Information Should a Whistleblower Provide?

- Description of the incident
- Date, time, and location
- Names of individuals involved
- Any evidence or documentation
- Whether the reporter wishes to remain anonymous

5. Confidentiality & non-retaliation

OPHCD guarantees:

- Complete confidentiality of the whistleblower's identity
- Protection against retaliation
- Fair and impartial investigation
- Swift follow-up and action

Retaliation against a whistleblower is a serious violation of OPHCD policy and will result in disciplinary action.

6. Investigation Process

1. **Receipt of the Report:** Acknowledge within 48–72 hours (if not anonymous).

2. **Screening:** Compliance & Internal Audit assess the allegation.
3. **Investigation:** Neutral investigation team collects evidence.
4. **Corrective Actions:** Disciplinary measures, policy adjustments, or legal action if required.
5. **Feedback to Reporter:** When possible and if not anonymous.

7. Recordkeeping

All cases are documented in a secure system accessible only to authorized personnel.

8. Awareness & Training

OPHCD regularly trains staff and partners on:

- How to identify wrongdoing
- How and where to report
- Protection of whistleblowers
- Ethical conduct and compliance

PROTECTION OF WHISTLEBLOWER

OPHCD is committed to ensuring that any person who makes a whistleblowing/disclosure is treated fairly and does not suffer detriment and that confidentiality is preserved in respect of all matters raised under this policy.

PROTECTION FROM LEGAL ACTION

The whistleblower will not be subject to any civil, criminal or administrative legal action (including disciplinary action) for making a disclosure under this policy or participating in any investigation.

Any information whistleblower provide will not be admissible in any criminal or civil proceedings other than for proceedings in respect of the falsity of the information.

PROTECTION AGAINST DETRIMENTAL CONDUCT

OPHCD will not engage in 'Detrimental Conduct' against whistleblower if made a disclosure under this policy.

Detrimental Conduct includes actual or threatened conduct such as the following (without limitation):

Termination of employment;
Injury to employment including demotion, disciplinary action;
Alternation of position or duties;
Discrimination;
Harassment, bullying or intimidation; Victimization;



Harm or injury including psychological harm; Damage to a person's property;
Damage to a person's reputation;
Damage to a person's business or financial position; or
Any other damage to a person.

PROTECTION OF CONFIDENTIALITY

All information received from a whistleblower will be treated confidentially and sensitively.

Whistleblower will not be required to provide their name when making a disclosure. To make a disclosure on an anonymous basis, it is recommended that whistleblower use a pseudonym and contact the Whistleblowing Protection Officers in the manner outlined above.

If someone is report on an anonymous basis, he/she will still qualify for the protections in this policy.

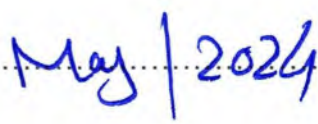
If a whistleblower makes a disclosure under this policy, his/her identity (or any information which would likely to identify them) will only be shared if:

- ✓ Whistleblower give their consent to share that information; or
- ✓ The disclosure is allowed or required by law (for example where the concern is raised with a lawyer for the purposes of obtaining legal advice); or
- ✓ The concern is reported to court.

Change control history

Version No:	Approval date:	Approved by:	Change:
001	March,2021	Board of Trustee General Director	
001	May,2024	Board of Trustee General Director	

Signature.....

Date.....

APPROVED BY:

After the review of the policy, on behalf of the OPHCD Board of Trustees, the said manual is hereby approved and ready to be implemented henceforth.

Reviewed and Approved: Board of Trustee

