

WHISTLE-BLOWING POLICY

SAHAYOG SOCIETY
A-240, INDIRA NAGAR, LUCKNOW





FOREWORD

This Whistle-Blowing Policy is a vital part of SAHAYOG's commitment to ethical conduct, transparency, and internal accountability. It encourages individuals to report any form of wrongdoing, misconduct, or violation of organizational values, without fear of reprisal.

At SAHAYOG, we understand that it takes courage to speak out when something is wrong. Through this policy, we aim to ensure that every stakeholder—whether internal or external—is empowered and protected when raising concerns in good faith. We believe that the voices of whistle-blowers play a key role in identifying risks, improving systems, and upholding the trust placed in our organization by the communities we serve.

We are committed to responding to reports with fairness, confidentiality, and without delay. This policy aligns with national standards and reflects our collective responsibility to foster a culture where integrity is valued, and misconduct has no place.

s/d

DIRECTOR
SAHAYOG



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Chapter 1. Introduction

The Whistle-Blowing Policy of SAHAYOG aims to reinforce the organization's commitment to its values, attitudes, and behaviors. The purpose of this policy is to provide an effective procedure for people to raise their concerns when they believe that abuse, serious malpractice or professional misconduct has taken place, which will impact any actual or potential violation of the Code of Conduct & Behavior at Work policy.

Addition (2025 Update):

This policy aligns with the principles laid out in the Whistle Blowers Protection Act, 2014 (where applicable), and other relevant internal compliance mechanisms, to ensure individuals can report concerns of serious misconduct or wrongdoing without fear of retaliation.



Chapter 2. Policy

This policy applies to all staff of SAHAYOG and those of Partner organizations, Consultants as well as Vendors and Vendor organizations who are in a relationship with SAHAYOG. The policy covers the responsibility to report all wrongful acts committed by staff of SAHAYOG, partners and members of the governing body only to the Ombudspersons, who are officially appointed to receive complaints, initiate the investigation. The Ombudsperson will also keep track of all reported cases and report the same to the Board.

Serious misconduct includes wrongdoing, corruption, bribery or theft.

This may include, but is not limited to:

- (i) Financial and procedural malpractice including those relating to mismanagement; misappropriation of funds; actual or suspected fraud or abuse of authority.
- (ii) Falsification of organizational records for personal gain or gain for others on the part of Staff, partners and members of the Governing Body.
- (iii) Miscarriage of justice
- (iv) Attempting to cover up any of the above
- (v) Being aware of a misconduct or misuse and not reporting it

Addition (2025 Update):

This policy extends protection to whistle-blowers from partner organizations, consultants, vendors, and other external stakeholders who engage with SAHAYOG in good faith.

Chapter 3. Reporting Responsibility

It is obligatory for all of SAHAYOG staff to report wrongful acts or suspected wrongful acts in accordance with this Whistle-Blowing policy. Staff of Partner organizations are also required to report such acts committed by SAHAYOG staff or their own staff in the execution of their Partnership agreements.

Chapter 4. Levels at which the concerns will be raised

Any member of the staff or partners believing they have suspicion or evidence of serious misconduct on the part of anyone associated with the organization should in the first instance bring the matter to the attention of the appointed Ombudsperson.

Revision (2025 Update):

The Ombudsperson must be an independent individual, preferably not involved in the management or direct operations of SAHAYOG, to avoid conflict of interest and ensure impartiality.



Chapter 5. Procedure for Reporting

The Whistle Blower's role is that of a reporting party with reliable information through Protected Disclosure. Protected Disclosure means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. The Whistle Blower(s) is/are not required or expected to act as investigators or fact finders, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.

Formatted (2025 Update):

Email for Reporting Concerns: whistleblowing@sahayogindia.org

Chapter 6. Confidentiality

The Whistle Blower will be accorded protection from victimization, or any other hostile behavior. But any person coming forward with such a concern/allegation will follow due procedure and give ample reason to show that these concerns have been raised in good faith. The identity of the person who raises concerns will be kept confidential as far as possible. However, this protection will be accorded to those individuals who make such disclosure with honest intention, and without malicious intent or spite.

The confidentiality of the reports will be kept to the extent possible, consistent with the need to conduct an adequate investigation. However, in certain cases, this may not be possible, particularly in instances warranting police investigation or when a disciplinary hearing is held, where individuals will need to make a statement.

Chapter 7. Handling of Reported Cases by the Ombudsperson

The Ombudsperson who receives such report will acknowledge receipt of the report within five working days.

All reports should be properly investigated by the Ombudsperson through an external team for investigation as appropriate.

All concerns raised will be investigated carefully and thoroughly. Any person accused of alleged misconduct will have the right to present their account of events in all fairness at the earliest opportunity.

Addition (2025 Update):

Investigations must be initiated within 10 working days of receipt and concluded within 45 working days, unless a valid reason is documented for any extension.



Upon completion of the investigation, the Management should take the appropriate corrective action as warranted by the outcome of the investigation and recommended by the Ombudsperson.

The Whistleblower would also be notified of the outcome of the investigation whenever it is possible to do so.

There may be occasions when external bodies such as donors and regulators may also be notified of the outcome of an investigation.

On an annual basis, issues raised through whistle-blowing will be tracked and reported to the board members in the Annual Board meeting by the Ombudsperson.

Chapter 8. Protection

No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. SAHAYOG condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers.

Addition (2025 Update):

Any form of retaliation, including demotion, denial of promotion, threats, harassment, or termination due to whistleblowing will be considered gross misconduct and will attract disciplinary action under SAHAYOG's employment policies.

If the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, SAHAYOG will arrange for the Whistle Blower to receive advice about the procedure, etc.

The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law.

Any other employee indirectly assisting in the said investigations shall also be protected to the same extent as the Whistle Blower.

Chapter 9. False Allegations

Any allegations not made in 'good faith' or found to be false or malicious, will be treated as a disciplinary offence and will be investigated in accordance with extant procedures.



Chapter 10. Prevention of Reporting

If some person tries to prevent an individual from making a confidential report or victimizes that person for raising their concerns, SAHAYOG will take this to be a serious disciplinary misdemeanor and this instance will be investigated in accordance with Disciplinary Policy.

Chapter 11. Anonymous Reporting

Revision (2025 Update):

Anonymous complaints, while not encouraged due to limitations in follow-up communication, will still be assessed for credibility. Where verifiable facts are present, appropriate investigations will be initiated, consistent with SAHAYOG's duty of care.

Chapter 12. Notification

All Managers are required to notify and communicate the existence and contents of this policy to the employees of their department and to all new employees respectively.

The onus of making the Partners aware of their responsibilities vests with Coordinators who will ensure that programme staff make Partners aware of their responsibility and make them understand that they may report any wrongful conduct of SAHAYOG staff in the execution of a Partnership agreement.

Chapter 13. Retention of Documents

All Protected Disclosures in writing or documented along with the results of the investigation relating thereto, shall be retained by SAHAYOG for a minimum period of 7 years.

Chapter 14. Training and Awareness (2025 Addition)

All staff and stakeholders will receive periodic training on the Whistle-Blowing Policy, including procedures, rights, protections, and obligations. The HR department will ensure annual awareness sessions and mandatory inclusion of this policy in employee induction.

Reviewed and revised by- Gul Srivastava
Date- June, 2025

Approved by- Secretary, Sahayog
