

LUTHERAN DEVELOPMENT SERVICES

WHISTLE BLOWING POLICY

1. Purpose

The Lutheran Development Services is committed to high standards of ethical, moral and legal business conduct. In line with this commitment and the Lutheran Development Services' commitment to open communication, this policy provides avenues for board members and employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistle blowing. This policy is thus intended to encourage board members, staff including volunteers and others to report actual or suspected occurrences of illegal, unethical or inappropriate events (behaviors or practices) without retribution.

2. Scope of this Policy

This policy applies to any matter which is related to Lutheran Development Services business and does not relate to private acts of an individual not connected to the business of the organization. The policy applies to all employees and those contractors working for organization and within the organization's premises, for example, daily wage workers such as cleaners, security providers etc. It also covers suppliers and those providing services under a contract with the organization in their own premises. This whistle-blowing policy is intended to cover major concerns that fall outside the scope of other procedures that include the following amongst others:

- Conduct which is an offence or a breach of law
- Disclosures related to miscarriages of justice
- Health and safety risks, including risks to the public as well as other employees
- Damage to the environment
- The unauthorized use of funds
- Possible fraud and corruption
- Sexual or physical abuse of clients, children or other employees

- Other unethical conduct
- Activities that are not in line with LDS policy, including the Code of Conduct and Accountability Framework.
- Activities which amount to serious improper conduct.

Thus, any serious concerns that workers have about any aspect of service provision or the conduct of officers or employees of organization or others acting on behalf of the management can be reported under the whistle-blowing policy. The policy provides for and encourages the following;

- i) The Whistle blower should promptly report the suspected or actual event to his/her supervisor
- ii) In the event the Whistle blower would be uncomfortable or reluctant to report to his/her supervisor the policy allows him/her to report the event to the next highest level or another level of management, including to an appropriate Board committee or member.
- iii) The Whistle blower can identify him / her in reporting the event or do it anonymously.
- iv) The Whistle blower shall receive no retaliation/retribution for a report that was provided in good faith.
- v) A Whistle blower who makes a report that is not done on good faith (done with malice to damage another person or the LDS) will be subject to discipline including termination of the Board/employee relationship, or other legal means to protect the reputation of the LDS and members of its Board and staff.
- vi) Anyone who retaliates against the Whistle blower (who reported in good faith) will be subject to discipline, including termination of Board or employee status.
- vii) Crimes against person or property, such as rape, assault, burglary,etc.,should be immediately reported to the Zimbabwe Republic Police.
- viii) Supervisors, Managers and or Board members who receive the reports from Whistle blowers must promptly act to investigate or resolve the issue.
- ix) The Whistle blower shall receive a feedback report within ten working days of the initial report, regarding the investigation, disposition or resolution of the issue.
- x) In the event the investigation of a report that was done in good faith and investigated by internal personnel is not satisfactory to the Whistle blower-the latter has the right to report the event to the appropriate level of management or Board.

- xi) The identity of the Whistle blower, if known, shall remain confidential to the persons directly involved in applying the policy, unless the issue requires investigation by law /Police, in which case members of the LDS are subject to subpoena.

3. Safeguards

3.1 Harassment or Victimization

The Lutheran Development Services is committed to the highest possible standards of openness, probity and accountability and in line with that commitment the organization will not tolerate any harassment or victimization (including informal pressures) for reporting concerns under this policy. The LDS will take appropriate action to protect whistle blowers/workers who raise concerns in good faith.

3.2 Confidentiality

The Lutheran Development Services is amply aware of the boomerang effects to Whistle blowers and thus all concerns will be treated in confidence and every effort will be made to treat the complainant's identity with appropriated regard for confidentiality.

3.3 Anonymous Allegation

This policy encourages complainants to put their names to allegations whenever possible to enable appropriate follow up questions. Some investigations may not be possible if the source of the information is unidentified. Concerns expressed anonymously will be scrutinized and explored with consideration given to:

- The seriousness of the issues raised
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

3.4NUntrue/Bad Faith Allegations

If a complainant raises a concern in good faith, but it is not confirmed by the investigation, no action will be taken against the whistle blower. If, however, the allegation is made in bad faith or is malicious, disciplinary action may be taken against the complainant.

4. Procedure for Raising and Handling Concerns

4.1 Process of Raising a Concern-Reporting

The whistle blowing procedure is to be used for serious and sensitive issues that include but not limited to the following: fraud, sexual abuse, unethical behaviors and breach to legal frameworks and Codes of Conduct.

- i. A complainant should raise his/her concerns with the supervisor first, however- if the complainant is uncomfortable or reluctant to report to his/her supervisor, he/she can report the event to the next highest level or another level of management, including to an appropriate Board committee or member.
- ii. The concern/report can be raised verbally or in writing.
- iii. The timing in expressing the concern is important-the earlier a concern is raised, the easier to take action.
- iv. While the complainant is not expected to prove the truth of an allegation, he/she should be able to demonstrate to the persons contacted the report is being made in good faith.

4.2 How the Report of Concern will be handled

The action taken by the Lutheran Development Services in response to a report of concern under this policy will depend on the nature of the concern. The Human Resources and Administration

committee of the Board shall receive information on each report of concern and follow up on the actions taken.

- i. Once the report is received, the supervisor will make initial inquiries to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved without an investigation.
- ii. Depending on the nature of the issue and clarity of the information, further information may be sought from or provided to the person reporting the concern.
- iii. In the event the initial inquiry and further clarifications warrant an investigation, it will be duly instituted and feedback on the matter be provided to the complainant within ten working days.
- iv. The feedback report will acknowledge receipt of complaint, advise how it will be dealt with or has been handled, update the complainant of support mechanisms put in place as well as further investigations if there are any.

Responsible Officer

The Lutheran Development Services' compliance officer has overall responsibility for the maintenance and operation of this policy. He / She will maintain a register of concerns raised, the resolutions thereof as well as satisfaction/dissatisfaction reports on the resolutions from the complainants.