



GLOBAL  
CENTER ON  
ADAPTATION

# WHISTLEBLOWER POLICY, GUIDELINES AND PROCEDURES

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## Executive Summary and Details

Purpose & Objectives	This Whistleblower Policy (hereafter the <b>Policy</b> ) aims to provide a supportive process that encourages and enables GCA employees and related personnel to raise concerns about misconduct within GCA without repercussion and will give them confidence that their concerns will be properly investigated and resolved in a timely manner.
Applicability	This policy applies to all GCA Representatives, including staff hired directly on employment contracts, or on other contracts (such as, but not limited to, consultants, advisors, contractors, fellows, trainees, and interns), as well as any external partners, suppliers, or vendors GCA works with.
Commencement Date	28 August 2022
Owner	Director of Finance and Operations
Approval	

### 1. Introduction

The Global Center on Adaptation (GCA) is committed to fostering a culture of integrity, honesty, transparency and accountability. It is expected that those working for and representing GCA shall act with integrity.

This Whistleblower policy, which includes the Guidelines and Procedure annexed hereto, aims to provide a supportive process that encourages and enables GCA employees and related personnel to raise concerns about misconduct within GCA without repercussion and will give them confidence that their concerns will be properly investigated and resolved in a timely manner.

This policy does not replace GCA's other policies. Rather, it is intended to complement them and offer an alternative channel to report suspected improper conduct in circumstances where the reporter desires the legal protections provided by Whistleblower law.

### 2. Policy Statements

GCA aims to maintain the highest standards of openness, decency, integrity and accountability in its work. Everyone who works with or for GCA must be vigilant for signs of wrongdoing or criminal activity by individuals or organizations working with or for GCA and are encouraged to report such behavior using this policy.

GCA encourages all personnel to **speak up and report** any concerns in line with GCA's policies and procedures on complaints and grievances.

GCA expects personnel to act **honestly and ethically**, and to make any report in good faith and on reasonable grounds.

GCA commits to its obligation to **protect** whistleblowers or anyone who participates in an investigation of them from reprisal.

GCA commits to maintain **confidentiality** of all reports and protect the identity of reporters to the fullest extent possible.

### 3. Scope

This policy applies to all GCA Representatives, including staff hired directly on employment contracts, or on other contracts (such as, but not limited to, consultants, advisors, contractors, fellows, trainees, and interns), as well as any external partners, suppliers, or vendors GCA works with.

Within this policy, all of these people are represented by the term "Personnel".

### 4. Purpose

The purpose of this Whistleblower Policy (hereafter the **Policy**) is to maintain integrity in the work environment for all personnel. GCA promotes high standards of behavior and conduct for all employees and takes appropriate corrective action where those standards are not met.

This Whistleblower Policy gives authority to employees to raise their concern in case they come across any type of misconduct, illegal action, or violation of the Code of Conduct or any other GCA policy.

### 5. Definitions

Whistleblowing can be defined as the disclosure of information, a perceived wrongdoing in an organization, or the risk thereof, to individuals or entities believed to be able to effect action. Whistleblowing is a term used to describe a situation in which an employee, trustee, volunteer or any other individual linked or associated with GCA raises a concern about possible malpractice, fraud, crime, danger, safeguarding or any other serious risk that could threaten primary actors, colleagues (staff members and volunteers), donors, the public or GCA's integrity and reputation.

#### [Difference between grievance and whistleblowing](#)

The difference between a whistleblowing issue and an employee grievance is that in the case of whistleblowing, the concern is about a danger or illegality that has a public interest to it. A grievance or private complaint, by contrast, is a dispute about the employee's individual employment position and has no additional public interest dimension.

## 6. Roles and Responsibilities

The **Chief Executive Officer (CEO)** is accountable for ensuring the effective implementation of this policy throughout GCA and representing GCA's interests and concerns in the event of publicity or litigation resulting from a whistleblowing allegation.

**Supervisors/Line manager/Directors** are responsible for ensuring that the principles of this policy are communicated and understood throughout their teams. They are also responsible for putting the policy into practice. These responsibilities include:

- Ensuring that all concerns raised by workers are taken seriously where appropriate.
- Ensuring that concerns are investigated properly, objectively and in a timely manner.
- Ensuring that the worker is kept informed of progress.
- Ensuring that action is taken to resolve the concern.

The **HR Manager** is responsible for providing coaching, advice and guidance to supervisors/line managers/ directors on the implementation and use of this policy. HR is responsible for ensuring that personnel are made aware of their rights and responsibilities in relation to whistleblowing at induction and to regularly encourage personnel to speak up about reportable matter.

The **Internal Audit and Compliance Officer** is the focal point who receives reports/complaints and acts as the investigating lead, responsible for conducting investigations fairly, objectively and in a timely manner.

**Personnel** are responsible for reporting misconduct, dishonest or illegal activity that has occurred or is suspected within GCA as quickly as possible, whether anonymously or otherwise.

## 7. How to Raise a Concern

GCA personnel have a responsibility to report any suspicion of alleged misconduct or malpractice as soon as they become aware. All attempts should be made to raise the concern internally in the first instance.

Reports of a suspicion of alleged misconduct should be made through the established internal channels, as follows, either:

- Verbally or in writing, to your line manager, HR Manager, or any member of the Leadership Team.
- Send an email to GCA's Whistle Officer at [speakup@gca.org](mailto:speakup@gca.org)
- Call or Whatsapp the Whistle Officer at **+31 643147051**.
- Report by using the webform on GCA's website: <https://gca.org/reportanincident/>
- Report anonymously using: [www.suggestionox.com/r/GCA\\_Whistleblow](http://www.suggestionox.com/r/GCA_Whistleblow)

Please see the Whistleblower Guidelines annexed to this Policy for guidance on raising a concern.

## Annex I: Guidelines and Procedures

These Whistleblower Guidelines and Procedures are part of and provide further detail in relation to the Whistleblower Policy.

### Definitions

A **whistleblower** is a person who, whether anonymously or not, attempts to report misconduct or dishonest or illegal activity that has occurred in connection with GCA, and wishes to avail themselves of protection against reprisal for having made the report.

The **Whistle Officer** is the person to whom the whistleblower turns to report the wrongdoing. GCA's whistle Officer is the Internal Audit & Compliance Officer.

**Reportable matter** is any past, present or likely future activity, behavior or state of affairs considered to be:

- Dishonest, corrupt, fraudulent, illegal or unethical;
- In breach of regulation, internal policy or GCA's Code of Conduct;
- Improper conduct relating to accounting, internal controls, compliance, audit or other matters of concern to the whistleblower;
- A serious impropriety or an improper state of affairs or circumstances;
- Endangering health or safety;
- Damaging or substantially risking damage to the environment;
- A serious mismanagement of GCA's resources;
- Detrimental to GCA's financial position or reputation;
- Maladministration (an act or omission of a serious nature that is negligent, unjust, oppressive, discriminatory or is based on improper motives); or
- Concealing reportable conduct.

### Safeguards for Whistleblowers

#### I. Protection of the Whistleblower

The whistleblower is given protection to safeguard them from any form of retaliation like reprisal or any kind of exploitation.

The whistleblower can neither be transferred nor demoted during the course of the investigation.

The identity of the whistleblower is kept confidential, unless the whistleblower has no issue with being identified or identification is necessary as per the law.

If the whistleblower comes across any kind of retaliation, he or she may file a complaint to the Whistle Officer. Strong disciplinary action will be taken against the person who retaliates.

Any other person/employee supporting the investigation will also be protected like the whistleblower.

This protection applies regardless of whether any concerns raised in a report are found to be true, provided that you are acting honestly and ethically and made the report on reasonable grounds.

This protection also applies to individuals conducting, assisting or participating in an investigation. You will also be entitled to protection if you report Reportable Conduct to an external body under this policy.

Anyone found to be victimizing or disadvantaging another individual for making a disclosure under these Guidelines will be disciplined and may be dismissed or subject to criminal or civil penalties.

## II. Confidentiality

Insofar as possible, GCA endeavors to ensure confidentiality of all reports received from whistleblowers. GCA personnel are encouraged to voice whistleblowing concerns openly under this policy. However, if personnel choose to raise concerns confidentially, GCA will make every effort to keep the personnel's identity anonymous.

GCA does not encourage personnel to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality.

## III. Anonymous Allegations

GCA recognizes that some whistleblowers may wish to remain anonymous. All issues raised will be looked into, but it is recognized that concerns expressed anonymously can be harder to follow up on or substantiate depending on the information provided.

## IV. False Allegations or Disclosures

If an individual makes an allegation in good faith, which is not proven by a subsequent investigation, no action will be taken against that individual. In making a disclosure the individual does not need to gather evidence or have all the facts and should not undertake their own investigation into their concerns. The obligation is to report concerns in good faith.

Anyone who knowingly makes a false report/ disclosure of reportable matter, may be subject to disciplinary action, including dismissal.

## Raising a Whistleblowing Concern/Report

Whenever personnel come across any improper act, they are requested to report the concern to GCA.

Disclosures can be made as follows:

- Verbally or in writing, to your line manager, HR Manager, or any member of the Leadership Team.
- Send an email to GCA's Whistle Officer at [speakup@gca.org](mailto:speakup@gca.org)
- Call or Whatsapp the Whistle officer at +31 643147051
- Report by using the webform on GCA's website at <https://gca.org/reportanincident/>
- Report anonymously using: [www.suggestionox.com/r/GCA\\_Whistleblow](http://www.suggestionox.com/r/GCA_Whistleblow)

## Handing a Concern/Report

Complaints of malpractice received through Whistleblowing will be passed to the Internal Audit and Compliance Officer or respective director(s), unless the Complaint is against a director. In such cases, the complaint should be passed to the Chief Executive Officer (CEO) for referral.

On receiving a concern/report, GCA will:

- Acknowledge receipt of the report/concern within three working days;
- Assess the report;
- Determine whether external authorities need to be notified;
- Determine whether and how to investigate;
- Appoint an appropriate and independent investigator if appropriate;
- Keep the whistleblower informed about the process and next steps.

## Investigation of an Allegation

If an investigation is deemed necessary, it will be conducted fairly, objectively and in a timely manner. GCA endeavours to deal with disclosures as sensitively and quickly as possible. Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not always possible to stipulate precise timescales for investigations.

GCA's Internal Audit and Compliance Officer (herein referred to as the "Investigating Lead") will ensure that the investigations are undertaken as quickly as possible without affecting the quality of the investigation. GCA aims to investigate allegations within two weeks of the receipt of the disclosure.

The investigation process will vary depending on the nature of the Reportable matter and the amount of information provided. It is important therefore that the report provide as much information as possible. This includes any known details about the events underlying the report such as the:

- date;
- time;
- location;
- name of person(s) involved;
- possible witnesses to the events;



- description of the events; and
- evidence of the events (e.g. documents, emails).

Investigations are conducted by the Investigating Lead. In the case of an allegation involving the Investigating Lead, the investigator will be named by the CEO. In case of an allegation involving the CEO, the investigator will be named by the Chair of the Supervisory Board, or in the case of a situation involving the Chair, the Vice-Chair.

The Investigating Lead may nominate an investigating officer to support with investigating the complaint.

The person(s) accused of the malpractice will be informed of the accusation as soon as is practically possible and, if necessary (if there appears to be some validity to the allegation) will be given the opportunity to respond. If a decision is taken to move into a disciplinary process, the normal provisions of the disciplinary procedure, including the rights to a hearing and to appeal, will apply.

The complainant has the right to bypass the line management structure and take their complaint directly to the Chair of the Supervisory Board. The Board Chair has the right to refer the complaint back to management if he/she feels that management, without any conflict of interest, can more appropriately investigate the complaint.

A judgement concerning the complaint and validity of the complaint will be made by the Investigating Lead. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the CEO.

The Investigating Lead will form a panel to decide what action to take following on from the report. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate GCA procedures.

The Investigating Lead should keep the complainant informed of the progress of the investigations and, if appropriate, of the final outcome. If the investigation is a prolonged one and extends beyond three months, the Investigating Lead should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to the address provided by them (this may be a suitable e-mail or home address).

## Outcome of an Investigation

At the completion of the investigation, a report will be prepared outlining:

- All relevant facts;
- A determination as to whether the allegation(s) have been substantiated or otherwise;
- The actions that will be taken, which may include disciplinary actions and dismissal.

The disciplinary action will depend on the severity, nature and circumstances of the Reportable Matter and will be conducted in line with GCA's Sanctions and Disciplinary Policy.

Where possible and appropriate, having regard to GCA's privacy and confidentiality obligations, the whistleblower will be informed of the outcome of any investigation into their concerns.

If the complainant is not satisfied that their concern is being properly dealt with by the Investigating Lead, they have the right to raise it in confidence with the CEO. If the CEO is involved in the case, this is escalated to the Chair of the Supervisory Board.