



Reaching out with love

WHISTLE BLOWER POLICY

APPLICABILITY	:	(See Scope)
VERSION	:	(DEC 2024)
WILL BE AUTHORISED BY	:	(BOARD)
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INTRODUCTION

The Vision Rescue Whistle-blowing system aims to reinforce the organization's commitment to conducting its business with honesty and integrity and to comply with its policies, values, attitudes and behaviors. The system provides a channel for reporting of suspected wrongdoing as quickly as possible, in the knowledge that concerns will be taken seriously and investigated appropriately and, in a way, which ensures that those who raise genuine concerns can do so without fear of reprisals.

PURPOSE

A Whistleblower Policy typically ensures that individuals, such as employees, volunteers, or external stakeholders, can report unethical behavior, violations, or legal breaches within the organization, without fear of retaliation. It reassures Whistle-blowers that they will be protected from reprisals for making a disclosure in accordance with this policy. So, the objective is to provide a platform for reporting concerns regarding unethical conduct, fraud, corruption, or any unlawful activities within the organization. It encourages transparency, accountability, and ensures protection against retaliation for those reporting issues in good faith. The Policy also displays Vision Rescue's commitment to honest practices, and responsible conduct of its employees, partners and stakeholders, and to recourse should these not be adhered to.

SCOPE

This policy refers to everyone in the Vision Rescue and associated personnel, beneficiaries from communities regardless of position or status.

This policy applies to all Vision Rescue's **Stakeholders** defined below.

- All Vision Rescue's **Staff, Contractors and Consultants**.
- All Vision Rescue's **Volunteers** including but not limited to office and event-based volunteers.
- All Vision Rescue's **Interns**.
- All Vision Rescue's **Partnerships**.
- All Vision Rescue's **Board Members**.

It majorly addresses concerns regarding, but not limited to:

- Fraud or corruption
- Violation of laws or regulations
- Misuse of organization's assets
- Harassment or discrimination
- Unsafe working conditions
- Financial mismanagement

KEY DEFINITIONS

- **Whistleblower:** A Whistle-blower is any person who raises a bona fide or genuine concern relating to a violation or misconduct or any of the above wrongful acts, including wrongful acts which may or may not be explicitly covered in the policy.
- **Protected Disclosure:** Information provided in good faith regarding unethical behavior or legal violations.
- **Retaliation:** Any adverse action taken against a whistleblower, such as termination, harassment, or discrimination.
- **Whistleblowing** is the voluntary disclosure of Misconduct by a person who has witnessed instances of, or holds suspicions regarding Misconduct within the Organisation.

WHAT SHOULD NOT BE REPORTED UNDER THIS POLICY

It is important to distinguish between whistleblowing and personal grievances.

- Complaints relating to personal circumstances in the workplace or to terms of employment (excluding the aforementioned wrongful acts listed above) should not be reported under the Vision rescue Whistle-Blowing policy.
- While Vision rescue takes concerns relating to personal circumstances and terms of employment seriously, they should be raised with the appropriate authority handling such concerns, namely HR Dept, by using the grievance & complaint procedure

RESPONSIBILITY TO IMPLEMENT

- Vision Rescue Board is responsible for adopting this policy and for making all ACCI Stakeholders aware of this policy and the avenues available to report instances (or suspicions) of Misconduct.
- Vision Rescue's CEO, as 'Whistle Blower Protection Officer', will be responsible for the implementation of this policy.
- All departmental heads and in particular HR managers are required to notify and communicate the existence and contents of this policy to the employees and associated personnel of their department and to all new employees and associated personnel respectively.
- All staff and all volunteers are responsible for reporting breaches of general law, organisational policy, or generally recognised principles of ethics to a person authorised to take action on such breaches.
- Members of staff of partner organisations and stakeholders from community may also report such wrongful acts committed by Vision rescue Staff or their own staff in the execution of their partnership agreements.

REPORTING MECHANISMS

Vision Rescue encourages Whistle-blowers to provide as much detail about their concern/s as possible, however at the same time, it is noted that it is not the Whistle-blower's role to investigate. Provision of the following information is recommended where possible:

- Provide a description of the alleged wrongdoing/misconduct

- Where possible provide any existing information that supports the allegation (e.g. emails, photographs)
- Date the disclosure
- Provide contact details for follow-up by Whistle Blower Protection Officer or Investigation Committee on the concern raised.

A. Anonymous Reporting

Vision Rescue encourages both anonymous and open disclosures, however we note that investigations may be more difficult if there is a need to obtain further information in the case of an anonymous report. Whistleblower can submit the Whistle Blower Disclosure Form as in Annexure 1 or a report with all possible details and evidence and put it in the drop box in each location. As per Complaint Handling Procedure HR dept will get it collected from locations periodically, and such whistleblower report or forms will be handed over to Whistle blower Protection Officer or General Secretary of Vision Rescue as per details provided in APPEALS section of this Policy, in case the report is about Whistle blower Protection Officer.

B. Internal Reporting

Vision Rescue provides multiple avenues for individuals to report any concerns:

- Whistleblower Protection Officer: A designated Whistleblower Protection Officer is responsible for receiving and overseeing reports.
- Email Address: Whistleblowers/Reporting Individuals can submit their reports by sending a confidential email to whistleblower@visionrescue.co.in.
- Direct Report: The report can also be made directly to senior management, if appropriate and if the Whistleblower feels comfortable doing so. Reports can be made as follows by filling the Whistle Blower Disclosure Form as in Annexure 1.

C. External Reporting

If the whistleblower does not feel comfortable with internal reporting channels or if the issue is not resolved, they may follow the steps below:

- Step 1 - Make Appeals to General Secretary of Vision Rescue as per details provided in APPEALS section of this Policy
- Step 2 - Report the issue to external regulatory bodies or authorities

INVESTIGATION PROCEDURE

All reports of Misconduct made under this policy will be assessed and investigated. Upon receipt of a report from a Whistleblower, the Whistleblower Protection Officer is responsible for informing the Vision Rescue's Board President and General Secretary that a report of Misconduct has been received, and determining whether the disclosure is a matter of Misconduct to which this policy applies, within 72 hours of receiving the report.

Where the Whistleblower Protection Officer determines that a report is trivial, vexatious or baseless, the Whistleblower Protection Officer will inform the Whistleblower of this assessment and no further action will be taken in relation to the report.

If it is determined that the report is a matter to which this policy applies, the following investigation processes will apply:

A) Acknowledgement of Receipt

- Upon receiving a report, the Whistleblower Officer or committee will acknowledge receipt of the complaint within 5 working days.
- If the report is anonymous, the organization will confirm that the issue has been logged, and outline the next steps.

B) Preliminary Assessment

- A Preliminary Assessment of the reported issue will be conducted within 10 working days to determine whether the concern raised falls within the scope of the Whistleblower Policy.
- The assessment will involve:
 - Reviewing the severity and nature of the issue.
 - Determining if further investigation is necessary.
 - Ensuring that the reported concern is not frivolous or malicious.
- The whistleblower may be contacted for additional information if the identity is known.

C) Investigation Process

- Assigning the Investigation Team: A team will be assigned to carry out the investigation. This team may consist of:
 - The Whistleblower Officer
 - Relevant senior management (excluding the accused, if possible)
 - Legal advisors or external auditors, depending on the complexity of the case
- The investigation will be impartial and conducted promptly.
 - Interviewing the Whistleblower: If the whistleblower's identity is known and willing, they will be asked for clarification and further details.
 - Gathering Evidence: The investigation team will gather documents, emails, records, or other materials relevant to the concern.
 - Interviewing Relevant Individuals: The accused and other witnesses may be interviewed to understand their side of the story and gather additional facts.

D) Timeline for Investigation

- The investigation should be concluded within 30 working days of receipt of the complaint, unless there is a valid reason for delay (e.g., complexity of the issue or the need for external expert opinion).
- If the investigation cannot be completed within this time frame, the whistleblower will be notified of the delay and a revised timeline will be provided.

E) Outcome of Investigation

- Upon conclusion of the investigation, a report will be prepared by the investigation team, summarizing the findings. This report will include:
 - A summary of the complaint

- An overview of the investigation process
- The evidence gathered
- The conclusions reached
- Actions/Consequences: Based on the findings, appropriate action will be taken, which could include:
 - Disciplinary action against those found guilty (e.g., termination, demotion, legal action, etc.)
 - Suggestions for procedural or policy changes to prevent future incidents
 - Reassurance to the whistleblower that the matter has been resolved, if appropriate.

F) Communication of Outcome

- The whistleblower will be informed of the outcome of the investigation in writing, whether the report was substantiated or not, within 15 working days after the investigation concludes. This communication will be made confidentially to ensure the protection of all involved.
- If the whistleblower is anonymous, they may not be contacted directly unless the communication was made via an identifiable channel

CONFIDENTIALITY

As per the Policy, complaints may be reported on a confidential basis or may be reported anonymously. Whistleblowers are encouraged to make any reports of Misconduct without the condition of anonymity and rely on the assurances provided in this policy regarding confidentiality of their identity. Vision Rescue hopes that individuals will feel able to voice Whistle-blowing concerns openly under this policy.

- Appropriate measures will be taken to preserve confidentiality Whistle-blowers
- While every effort will be made to keep a Whistle-blowers' identity confidential, there may be circumstances in which it will be necessary to disclose an identity; this may occur in connection with associated disciplinary or legal investigations or proceedings.
- If it is deemed necessary that the investigating committee/party involved be informed of a Whistle-blowers' identity, it will be discussed with the Whistle-blower in advance.
- The investigation process will be kept confidential. Only those directly involved in the investigation will be aware of the details of the case.
- Any communication regarding the investigation will be limited to the necessary parties

PROTECTION OF WHISTLE BLOWER

It is understandable that Whistle-blowers are sometimes concerned about possible repercussions emanating out of the complaints or concerns lodged. Vision Rescue therefore aims to encourage openness and will support staff and others who raise genuine concerns under this policy, even if such concerns turn out to be of a mistaken nature.

- No individual raising genuinely held concerns in good faith under this policy will be dismissed or be subject to any detrimental consequences arising from their actions such as unwarranted disciplinary action, victimisation, threats or other unfavourable treatment.
- If any person/s is subjected to detriment as a result of making a disclosure, they should inform the appropriate authority immediately using the methods and channels as set out in this policy. If the matter is not remedied, they should raise it formally using Vision rescue's in country or Grievance & Complaint Procedure where applicable.
- Vision Rescue Staff must not in any way threaten or retaliate against Whistle-blowers. If any member of staff is found to be guilty of such conduct, that staff member will be subject to disciplinary action.
- If any Vision Rescue staff member is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment. It is important to note that if a case is not upheld that does not always mean that the complaint was false, but rather in some cases that there was insufficient evidence to uphold the allegation or complaint in question.
- Support will be offered to Whistle-blowers as appropriate, regardless of whether a formal response is carried out (e.g. an investigation). This may include specialist psycho-social counselling, medical support, legal support and/or access to other specialist and appropriate support as needed.
- Whistle-blowers can decide if and when they would like to utilise the support options available to them. Vision rescue is committed to taking Whistle-blowers guidance and concerns, where safe and appropriate, on board. In this regard, Vision rescue is furthermore committed to working with local NGOs and women's rights groups in ensuring that the support it offers to whistle-blowers are appropriately diverse in nature.

APPEALS

Whistleblowers are entitled to appeal in this process following any decision arising from the assessment stage or investigation stage of the process. Notice of appeal shall be in writing and must be submitted within 5 working days of the decision to the relevant investigating body. Such appeals can be made to General Secretary of Vision Rescue Board.

Contact Details of General Secretary of Vision Rescue Board

Name : Mr. Navin Chatterjee
 Email : secretary@visionrescue.co.in
 Phone : +91 98677 45305

WITHDRAWING A COMPLAINT

A grievance or complaint can be withdrawn at any time with a satisfactory evidence to prove that the initial reporting of misconduct was an oversight/misunderstanding of the facts, unless management consider it to be too serious to be withdrawn. For example, it may be too serious if it involves a serious breach of Code of Conduct or a risk to workplace health and safety.

MALICIOUS AND VEXATIOUS COMPLAINTS

Vision Rescue encourages employees to raise all genuine concerns. Employees should not be put off from raising concerns because they are afraid that they may be wrong or they won't be able to prove their claims.

However, making allegations that are not true, or making a complaint solely to cause trouble for others, may be serious misconduct. Employees making such malicious and vexatious complaints will be subject to disciplinary action. Any false allegation/s, by any other stakeholders, which proves to have been made maliciously or with a view to personal gain will be viewed as a serious offence and may result in stern action.

If it is alleged during the entire procedure that the alarm raised is malicious or vexatious, this will be investigated at the same time as the ongoing original whistleblowing investigation.

ANNEXURE 1: WHISTLE BLOWING DISCLOSURE FORM

STRICLTY CONFIDENTIAL

[illegible]

PERSONAL INVOLVEMENT / PERSONAL INTEREST				
Please declare any Personal interest you may have in this matter (i.e. Does the outcome of this matter have the potential to affect you personally in any way?				
EXPRESSED PREFERENCES				
Do you wish your concern to be treated in confidence?	Yes		No	
Are you willing to participate with any further enquiries into this matter or formal investigation?	Yes		No	
<u>Signature of the Whistle Blower</u>				
FOR OFFICIAL USE ONLY				
Complaint Registration No.		Date		
Name		Signature		