Policy on Whistleblowing and Protection Against Retaliation

Version 2

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Title in English:	Policy on Whistleblowing and Protection Against Retaliation
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Related Policies and Procedures	• Code of Ethics and Business Conduct for Personnel. • Staff Management Policy • Ethics & Business Conduct Escalation Framework • Manual of Procedures for General Services Staff • Internationally Recruited Staff Manual of Procedures • Conflict of Interest Policy • Anti-Money Laundering and Anti-Terrorist Financing Policy • Anti-Fraud, Anti-Bribery and Anti-Corruption Policy
History of versions	Version 2
Key points	This update has made clear definitions of terminologies used in the policy. The reporting mechanism has been made very clear and escalation to the CGIAR Integrated Partnership EBC Lead

1. Introduction & Purpose

1.1. AfricaRice is committed to the highest standards of accountability and transparency and to ensuring that its operations and resources are managed efficiently, ethically and lawfully, while striving to pursue its vision to sustainably improve food and nutrition security for a healthy and prosperous Africa and its mission to deliver rice-based innovations and transform rice-based agri-food systems that contribute to the transformation of food, land and water systems in the face of climate change.

1.2. In accordance with AfricaRice' Core Ethical Values, the Center is also committed to fostering a diverse, inclusive, fair and safe working environment and a work culture, where individuals are encouraged to speak up against improper conduct. AfricaRice staff, hosted organizations staff, consultants, interns, collaborators and partners come from different backgrounds, cultures, and experiences. An important element of accountability and transparency is the ability for individuals, including but not limited to AfricaRice' staff, to report their concerns about unlawful or unethical conduct in a responsible and effective way without fear of retaliation.

1.3. The purpose of this Policy is to assist and enable individuals or entities to report reasonably held suspicions of ethical misconduct so that AfricaRice can address and correct improper conduct and protect those who report such concerns from retaliation. The protections under this Policy extend also to individuals who engage in any protected activity as defined under this Policy.

2. Scope

2.1. This is a Centre-wide Policy that applies to all AfricaRice staff, temporary staff, consultants, trainees, interns, and students. Third parties, including contractors, vendors, service providers, and partners are expected to adhere to the standards set out herein.

2.2. When required by external partners, such as governments and independent agencies, AfricaRice will include adherence to this policy in collaboration agreements.

3. Definitions

3.1. **Whistleblower:** An individual who reports in good faith a reasonably held suspicion of misconduct or violation of policies, procedures, or applicable laws within AfricaRice.

3.2. **Retaliation:** Any direct or indirect detrimental action, where such action has been recommended, threatened, or taken for the purpose of punishing, intimidating or injuring an individual because that individual engaged in protected activities, including reporting misconduct or cooperating with investigations

3.3. **Protected Activity:** Activities such as reporting misconduct, assisting whistleblowers, or cooperating in investigations or grievance processes, carried out in good faith and with reasonable grounds.

3.4. **Ethical Misconduct:** Conduct prohibited by AfricaRice professional standards as described in the Code of Ethics and Business Conduct (CEBC) and other EBC related policies.

3.5. **Suspicion of Ethical Misconduct**: Any suspected or actual misconduct as defined in 3.4 above.

3.6. **False or Malicious Report**: An inaccurate or misleading report that is made recklessly, knowingly or deliberately to gain undue advantage or cause harm to a person or entity. Making a False or Malicious Report constitutes a separate act of wrongdoing and may result in administrative, corrective and/or disciplinary measures or sanctions.

3.7. **Wrongdoing**: Any conduct that violates AfricaRice policies, rules and procedures.

3.8. **Conflict of Interest:** Situations where personal interests interfere with organizational duties.

3.9. **Staff:** means a person appointed by AfricaRice and governed by Staff Management Policy and related manuals.

4. Policy Statements

4.1. **Duty to Report**: All AfricaRice staff have a duty and are encouraged to report suspicions of misconduct, unethical behavior, actual or possible violations of laws or policies, or AfricaRice' rules as soon as possible after the relevant event.

4.2. **Good Faith Reporting**: Reports should be made in good faith in accordance with relevant procedures for reporting misconduct and contain sufficient detail to allow for proper assessment. Anyone who files a complaint that is known to be false or malicious, or with a reckless disregard for the truth of the statements made, could be considered to be making a False or Malicious Report, as defined in Section 3.6 above, and may be subject to administrative or disciplinary action.

4.3. **Protection Against Retaliation**: AfricaRice strictly prohibits any form of retaliation against whistleblowers and ensures measures to protect individuals engaging in protected activities.

4.4. **Case Management**: AfricaRice will handle reported cases in alignment with its own established procedures and processes while upholding the principles of the CGIAR Integrated Partnership whistleblowing policy. All whistleblowing reports shall be acknowledged, assessed and investigated in a fair, objective, and impartial manner to determine the appropriate measures to be taken.

4.5. **Consistency and Transparency**: Handling of cases will be consistent and transparent in processes and outcomes to the best of Center abilities while maintaining confidentiality.

4.6. **Confidentiality**: All reports will be treated with the highest level of confidentiality, with information shared on a need-to-know basis, ensuring the protection of due process, adherence to applicable laws, and the rights of individuals involved subject to the immunities and privileges of the Center.

4.7. **Impartiality and Fairness**: Investigations will be conducted objectively and in line with due process to ensure fairness to all parties.

4.8. **Independent Third-Party Investigation**: Reports of misconduct may be referred to qualified external investigators, legal counsel/firms, or other independent experts to conduct or support investigations where necessary to preserve independence, avoid conflicts of interest, address matters where Director General or Board of Trustees (BOT) or Board Committee members are conflicted, or where the required capacity to investigate is not available, with consideration of the seriousness or complexity of the alleged misconduct.

4.9. **Conflict of Interest:** Individuals involved in acknowledging, assessing, investigating, reviewing, or deciding matters under this Policy shall disclose any actual, potential, or perceived conflict of interest and recuse themselves where appropriate.

5. Reporting Mechanism

5.1. Reports should be factual and submitted promptly after the incident and contain as much information as possible to allow for proper assessment of the nature, extent, and urgency of the matter to allow for timely resolution.

5.2. **Internal Reporting Channels**: -

- **5.2.1.** Office of the Director General
- **5.2.2.** Executive Management Committee.
- **5.2.3.** Regional Heads and Country Managers.
- **5.2.4.** Heads of Units and direct Supervisors.
- **5.2.5.** Human Resources Office.
- **5.2.6.** Internal Audit.
- **5.2.7.** Ethics/Legal Office.
- **5.2.8.** Reports can be made in person or in writing. All reports must be submitted to the designated office within AfricaRice for appropriate course of action.

5.3. Reports against Senior Leadership: Reports involving the Director General shall be escalated directly to the Chairperson of the BOT or an authorized Board Committee. Reports involving members of the BOT shall be escalated to the Board Chairperson or an authorized Board Committee, as appropriate.

5.4. A secure online whistleblowing platform that provides reporting, case tracking, and investigation management will be implemented.

5.5. A secure whistleblowing email address accessible only to the Ethics/Legal Office or Internal Audit Office.

5.6. Third-Party Reporting: AfricaRice staff are expected to report suspicions of misconduct through the above-established channels. Protection from retaliation will be extended to individuals who report their concerns externally if:

- **5.6.1.** The individual reported their suspicions to AfricaRice using the established internal channels above, and AfricaRice failed to inform the individual of the status of the matter within six months of the report.
- **5.6.2.** External reporting may be necessary where suspicion of misconduct involves AfricaRice senior management (EMC) or the Board of Trustees.
- **5.6.3.** External reporting is necessary to avoid imminent danger to public interest, substantial damage to CGIAR Integrated Partnership operations, or violations of law.
- **5.6.4.** Reporting may be channeled through Whistleblowing hotline www.lighthouse-services.com/cgiar or ethics@cgiar.org

5.7. Presumption of innocence and right to respond: Individuals who are the subject of an allegation are presumed innocent until the allegation is established through due process. Individuals who are the subject of an allegation have the right to be informed of the allegations and to respond fully as part of the due process, in accordance with applicable policies and procedures.

6. Protection Against Retaliation

6.1. AfricaRice prohibits any form of retaliation against whistleblowers. Retaliation includes harassment, intimidation, or adverse employment actions. Any person found to have engaged in retaliation will be subject to disciplinary action, as per the Staff Management Policy. AfricaRice shall not tolerate any direct or indirect use of its systems or processes to undermine whistleblowers and individuals participating in the due process have the right to continue performing their functions or to make further disclosures.

6.2. Reports of Retaliation: Staff who have reasonable grounds to believe that retaliation has been taken against them, or will be taken against them, for having engaged in a protected activity may seek redress by submitting a retaliation complaint through the internal reporting channels listed above as soon as possible, and no later than 6 months following the adverse action. Retaliation complaints will be responded to in a timely manner based on seriousness, severity and urgency of the complaint.

6.3. Immediate Protections: based on a preliminary assessment of the complaint, AfricaRice may implement interim measures to protect whistleblowers, such as reassignment, offering remote working arrangements, a request to take leave, and/or suspension of reported retaliatory actions. Interim measures may be requested by the complainant in their written submission and must be agreed to by AfricaRice before they are implemented.

6.4. Scope of Protection: Protection against retaliation extends to the whistleblower and individuals participating in the resulting due process. It also applies to external reporters when internal mechanisms prove ineffective or when internal reporting poses risks to public safety or AfricaRice' integrity.

6.5. **Accountability for Retaliation**: Individuals found to have engaged in retaliatory actions will face disciplinary measures, up to and including termination of employment or contracts. Attempts by management or staff to identify an anonymous whistleblower's identity will be taken seriously and may result in disciplinary action

6.6. **Resolution:** Complaints are resolved following the procedures established by AfricaRice, ensuring adherence to due process and confidentiality.

7. Confidentiality

7.1. AfricaRice shall treat the identity of the whistleblower, the disclosed information, and all records related to a whistleblowing report as confidential throughout the reporting, assessment, investigation, and resolution process.

7.2. Disclosure shall be limited to persons with a legitimate need to know for the purposes of reviewing, investigating, or taking corrective action, or where disclosure is required by law or necessary to ensure procedural fairness.

7.3. All parties involved in the whistleblowing process are required to maintain confidentiality and to handle information with due care and discretion, breaches of confidentiality will result in disciplinary action.

7.4. Where wrongdoing is substantiated, confidentiality may be lifted as per provisions of this policy.

7.5. Records and Data Protection: AfricaRice shall maintain secure records relating to whistleblowing matters and ensure that all case-related information is handled in accordance with applicable data protection, confidentiality, records retention, and information security requirements.

8. Implementation and Training

8.1. AfricaRice will ensure all staff receive training on this policy during onboarding and at regular intervals and provide resources and tools to facilitate reporting and case management.

8.2. The Center will ensure third parties interacting with AfricaRice are made aware of this policy, monitor and evaluate the policy's effectiveness across the Center.

9. Roles and Responsibilities

9.1. Board of Trustees

9.1.1. Review and approve changes and revisions to this policy.

9.1.2. Champion an ethical organizational culture by actively embracing this Policy

9.1.3. Provide oversight for compliance with this Policy.

9.1.4. Approve the lifting of confidentiality on substantiated wrongdoing.

9.2. Director General

9.2.1. Review, approve and implement the provisions of this Policy.

9.2.2. The DG holds ultimate accountability for institutional integrity and ensures that whistleblowing arrangements remain credible, independent, and effective.

9.2.3. Approve the engagement of external investigator where required.

9.2.4. Ensure that all Staff have access to, are familiar with, and know their responsibilities pursuant to this Policy.
9.2.5. Ensure appropriate measures are in place to protect from reprisal/retaliation anyone who reports wrongdoings and makes a good faith report.
9.2.6. Approve the lifting of confidentiality on substantiated wrongdoing.

9.3. Executive Management Committee

9.3.1. Review and recommend updates and revisions to this policy.
9.3.2. Championing an ethical organizational culture by actively embracing this Policy, setting the tone, and leading by example.
9.3.3. Support the implementation of this Policy.

9.4. Program Leaders/Country Managers/Heads of Units

9.4.1. Remains vigilant in ensuring their staff compliance with this policy.
9.4.2. Immediately report any breach of the policy or suspicion of prohibited transactions to EMC or the Internal Audit.
9.4.3. Ensures that staff receive all information relating to this policy as communicated by the Ethics/Legal Office or AfricaRice management.

9.5. Ethics/Legal Office

9.5.1. Ensure implementation and adherence to this policy
9.5.2. Review and prepare changes, updates and revisions to this policy.
9.5.3. Organize Regular campaigns across AfricaRice promote awareness of this Policy.
9.5.4. Collaborates in the development and implementation of training programs for staff.

9.6. Human Resources Unit

9.6.1. Coordinate the development and implementation of appropriate training programs for staff, either with staff from the unit or with external consultants.

9.7. Internal Audit Unit

9.7.1. Receives, investigates and reports on all allegations reported.
9.7.2. Support the development and implementation of training programs for staff.

9.8. Staff

9.8.1. Adhere to the provisions of this Policy.
9.8.2. Take prompt action if they observe any breach or non-compliance to this Policy.
9.8.3. Cooperate fully in any commissioned investigations.
9.8.4. Actively Participate in training programs relating to this Policy.

10. Review.

10.1. This policy will be reviewed every three years or earlier if required by the Ethics/Legal Office.
10.2. Any changes made to the Policy will be presented to the Executive Management Committee (EMC) for endorsement and thereafter submitted to the Board of Trustees for approval.

11. Related Documentation

11.1. Code of Ethics and Business Conduct for Personnel.
11.2. Policy on Whistleblowing and Protection from Retaliation
11.3. Staff Management Policy

11.4. Ethics & Business Conduct Escalation Framework
11.5. Manual of Procedures for General Services Staff
11.6. Internationally Recruited Staff Manual of Procedures
11.7. Conflict of Interest Policy
11.8. Anti-Money Laundering and Anti-Terrorist Financing Policy
11.9. Anti-Fraud, Anti-Bribery and Anti-Corruption Policy