

WHISTLEBLOWER AND COMPLAINTS PROCEDURE

NEF aims to be a reliable and transparent organization and ally, maintaining high-quality relationships with its staff, donors, partners, suppliers and other stakeholders. We welcome, and take seriously, feedback from anyone working with us.

This Whistleblower and Complaints Procedure concerns mainly the third parties with whom NEF has relationships and contracts. For the NEF staff, internal mechanisms¹ are in place and going through SeeHearSpeakUp is viewed as complementary where the internal mechanisms do not seem to be appropriate.

How to report a concern?

If you are dissatisfied with an aspect of the NEF's policies, procedures, behaviours or ways of working, we encourage you to first seek resolution with your staff point of contact at NEF.

If you feel the grievance is of a serious or sensitive nature, we work with an external Whistleblower service to whom formal complaints can be submitted. SeeHearSpeakUp is a third party independent company who provides different avenues for exposing unethical behaviour and other forms of wrongdoing or malpractice. Please see the below list outlining the types of issues SeeHearSpeakUp handles.

Reporting can be done in three ways:

- Call SeeHearSpeakUp on its global telephone line +44.12.2437.9303.
- Use the SeeHearSpeakUp online reporting tool.
- Email SeeHearSpeakUp at report@seehearspeakup.co.uk.

SeeHearSpeakUp operates globally and has interpreting services available for non-English speaking callers. The global telephone line is operated 24 hours a day, 365 days a year.

How is your concern handled by SeeHearSpeakUp?

When you make contact through SeeHearSpeakUp's designated telephone service, you will speak with a specialized call handler who will ask you for some information, document your concern and ask follow-up questions to clarify information.

The call handler will then prepare a report of your concern to be sent to NEF's Executive Director and to the NEF Finance and Resources Manager. If the concern relates to the NEF Executive Director or to the NEF Finance and Resources Manager, The NEF Chair has been nominated to receive the information instead. Concerns are shared with the NEF typically within one-day. However, in circumstances where SeeHearSpeakUp is passed information regarding alleged serious misconduct (such as criminal activity) your concern will be reported within one hour. The same procedure is followed for complaints submitted online or by email.

¹ The NEF staff rules and NEF RH manual detail the NEF internal procedures

Is it possible to remain anonymous?

It is possible to remain anonymous in this process. Calls to SeeHearSpeakUp are not recorded. All callers who wish to raise reports through SeeHearSpeakUp will be provided with a Personal Identification Number (PIN). As a result, SeeHearSpeakUp has no means of identifying callers unless they volunteer details. You should retain the PIN, which can be quoted should you wish to contact SeeHearSpeakUp in the future to request information on related follow-up, or should you wish to provide additional information pertaining to your original report. SeeHearSpeakUp will redact all reports to exclude the name of the informant or any other identifying information before they are forwarded to NEF.

NEF is committed to protecting Whistleblowers against retaliation from an affected party in the event that the Whistleblower's identity is known or suspected.

What can be reported to SeeHearSpeakUp?

- **Fraud:** Any intentional or deliberate act to deprive another of property or money by guile, deception, or other unfair means.
- **Legal:** Failure to comply with legal obligations.
- **Bribery:** Bribery is a specific offence which concerns the practice of offering something, usually money, to gain an illicit advantage.
- **Corruption:** Corruption is a form of dishonest or unethical conduct by a person entrusted with a position of authority, often to acquire personal benefit.
- **Theft:** The unauthorized removal or taking of supplies, equipment, furniture, fixtures, products, cash, merchandise or other tangible property.
- **Financial mismanagement:** Statements or actions that encourage or result in false or intentionally misleading entries into accounting, auditing or financial records.
- **Discrimination:** Statements or actions based on age, race, colour, national origin, sexual orientation, gender, disability or religion that are the basis for employment, promotion or compensation decisions.
- **Harassment:** Persistent statements, conduct or actions that are uninvited, degrading, offensive, humiliating or intimidating and create an unpleasant or hostile environment.
- **Retaliation or retribution:** Statements or actions discharging, demoting, suspending, threatening, harassing or discriminating against an employee because of any lawful act taken by such employee in connection with reporting a violation of law or policy, filing a complaint, or assisting with an investigation or proceeding.
- **Environment, health and safety:** Conduct, actions, policies or practices that either violate local, provincial or federal environmental, health or safety laws or regulations or may cause or result in potentially hazardous conditions that impact the environment or the health or safety of employees, customers or others.
- **Bullying:** The use of force, threat, or coercion to abuse, intimidates, or aggressively dominate others. The behaviour is often repeated and habitual.

Follow-up

An “ad hoc Inquiry Committee” will be formed to review and respond to the report submitted to NEF from SeeHearSpeakUp. This Committee may be made up of different individuals, they will be appointed in consultation with SeeHearSpeakUp based on their expertise on the matters of report and of their lack of conflict of interest. Based on the nature of the report received, the Committee will also entail:

- If the report submitted implicates a NEF employee, the direct supervisor of that employee and/or the NEF board chair (depending on the situation) will be informed.
- If the report implicates someone external – but connected to NEF - a Committee of appropriate individuals will also be formed. This may include a mixture of NEF staff and board members.

The ad hoc Inquiry Committee will evaluate the report and start a preliminary inquiry within a period of seven days of receipt. After no more than two weeks, the ad hoc Inquiry Committee will make a recommendation regarding future actions to be taken. There are two possible outcomes for this recommendation:

1. The first is that the report is inadmissible. A report may be deemed to be inadmissible if it is not sufficiently compelling, or because the preliminary inquiry has not found any proof.
2. If the report is deemed to be valid and admissible, the ad hoc Inquiry Committee may involve further external parties – for example an auditor or legal authorities, depending on the nature of the complaint submitted. In some cases, complaints may be resolved internally – for example through the dismissal of a staff member or consultant, cancellation of a contract with an external service provider, etc.

NEF will report on the recommendations and outcomes of the ad hoc Inquiry Committee’s work to SeeHearSpeakUp, via SeeHearSpeakUp’s online case management system. The Whistleblower has the right to be notified of any action taken regarding their complaint. This may be done via SeeHearSpeakUp, with due care of the safety and security of the reporting person.