Denny Social Welfare Hub

"Impacting lives for a better society"

Incorporated Trustees | CAC/IT/NO 147826

Whistleblower (Speak Up) Policy

Reporting Wrongdoing Safely and Confidentially

Document Title	Whistleblower (Speak Up) Policy
Organisation	DENNY SOCIAL WELFARE HUB (DSWHUB)
CAC Registration	CAC/IT/NO 147826
Version	2.0
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Approved By	Board of Trustees
Owner	Executive Director / Secretary to the Trustees

1. About Denny Social Welfare Hub

DENNY SOCIAL WELFARE HUB ("DSWHUB", "the Organisation", "we", "our") is a not-for-profit, non-political organisation registered with the Corporate Affairs Commission of the Federal Republic of Nigeria as Incorporated Trustees under Registration Number CAC/IT/NO 147826 on 1 July 2020. Our registered office is at 4, Alimosho Road, Off Lagos-Abeokuta Expressway, by Pako Bus Stop, Iyana Ipaja, Lagos, Nigeria.

Our objects, as set out in our Constitution, are to:

- Build communities in which all children live with a loving adult or caregiver in a safe family home with easy access to food, healthcare, education, recreation, and emotional support;
- Advance the rights of vulnerable women and girls, including returnees, and build their capacity to improve their status, reproductive health, and economic and political participation;
- Expand the capacity of local women, girls, women's groups and communities to access and participate in the design and implementation of policies and programmes that affect their health and development;
- Provide legal assistance to individuals and local groups, and support public interest litigation;
- Care for and protect children by preserving family life and preventing family disintegration through a social developmental approach.

2. Purpose

To enable any person to raise concerns about wrongdoing within or affecting DSWHUB in confidence, without fear of retaliation, and to ensure such concerns are investigated and resolved promptly and fairly.

3. Scope

Open to anyone — Trustees, staff, volunteers, interns, consultants, contractors, partners, beneficiaries, suppliers, donors and members of the public.

4. What to Report

This Policy covers reasonable, good-faith concerns about, but not limited to:

- Fraud, theft, embezzlement, money laundering or terrorism financing;
- Bribery, kickbacks, or any form of corruption;
- Sexual exploitation, abuse or harassment;
- Child abuse, neglect or exploitation;
- Discrimination, bullying, or unsafe working practices;
- Misuse of donor funds or assets;
- Falsification of records, data or reports;
- Conflicts of interest that have not been declared;
- Breach of law, donor rules, or DSWHUB policies;
- Concealment or attempted concealment of any of the above.

Personal grievances about your own employment are normally handled under the Grievance Procedure unless they raise a public-interest issue.

5. Protection from Retaliation

DSWHUB will not tolerate any form of retaliation against a person who makes a report in good faith. Retaliation includes dismissal, demotion, exclusion, harassment, withdrawal of services, or any other detriment. Retaliation is itself a serious disciplinary offence.

A report made maliciously or knowingly false is not protected and is itself a disciplinary matter.

6. How to Report

6.1 Internal Channels

- Your line manager (if not implicated);
- HR Lead;
- Designated Safeguarding Lead (for safeguarding/PSEA matters);
- Executive Director;
- Chair of the Board of Trustees (especially where senior staff are implicated);
- Confidential email: info@dswhub.org;
- Anonymous online form on https://dswhub.org;
- Postal — sealed envelope marked 'Confidential Speak Up' to the Board Chair at 4, Alimosho Road, Off Lagos-Abeokuta Expressway, by Pako Bus Stop, Iyana Ipaja, Lagos, Nigeria.

6.2 External Channels

Reports may be made directly to:

- The Independent Corrupt Practices and Other Related Offences Commission (ICPC);
- The Economic and Financial Crimes Commission (EFCC);
- The Nigeria Police Force;
- NAPTIP for trafficking and SEAH;
- National Human Rights Commission;
- Special Control Unit Against Money Laundering (SCUML);
- The donor where the concern relates to a donor-funded project.

7. Anonymity and Confidentiality

Reports may be made anonymously. Where the reporter is identified, their identity is held in strict confidence and shared only on a need-to-know basis with the investigation lead and, where required, external authorities. The Organisation may have to disclose identity in certain legal proceedings; reporters are informed if this becomes necessary.

8. Handling of Reports

1. Acknowledgement within 5 working days where the reporter is identifiable;
2. Initial assessment by the receiving officer (or by the Board Chair where the Executive Director is implicated) within 10 working days;

3. Decision: dismiss as not a whistleblowing matter, refer to grievance, refer for safeguarding/PSEA response, conduct internal investigation, or refer externally;
4. Investigation by an independent investigator with no conflict, target turnaround 30 to 60 working days;
5. Report to the Board with findings and recommendations;
6. Outcome: disciplinary action, recovery, policy change, referral to law enforcement;
7. Feedback to the reporter where possible, consistent with confidentiality.

9. Records

All Speak Up reports are logged in the Whistleblower Register held by the Board Chair. Records are retained for a minimum of seven years.

10. Roles

- Board: receives a quarterly summary of reports; reviews handling; appoints external investigators where needed;
- Executive Director: oversees the system, allocates resources, ensures protection of reporters;
- HR Lead: ensures non-retaliation in employment matters;
- All Personnel: report concerns under this Policy.

11. Linked Policies

- Code of Conduct and Ethics;
- Anti-Fraud, Bribery and Corruption Policy;
- Child Safeguarding Policy and PSEAH Policy;
- Grievance and Disciplinary Procedure;
- Data Protection Policy.

12. Review

Reviewed every two years or sooner.

Approval

This policy is approved by the Board of Trustees of DENNY SOCIAL WELFARE HUB and shall take effect from the date stated above. It will be reviewed every two years or earlier if there is a material change in law, donor requirement, or organisational practice.