



Whistle Blowing Policy

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Whistleblower policy is a critical tool for protecting individuals who report activities believed to be illegal, dishonest, unethical, or otherwise improper.

Definition of a Whistleblower:

For the purposes of this policy, a whistleblower is a staff of SSEVS who reports actions they believe to be illegal or unethical to designated authorities within the company. The whistleblower's role is not to investigate the activities or assign blame; these tasks are handled by the appropriate management team.

Purpose of this policy:

The purpose of this policy is to articulate the organization's point of view on whistle blowing, the process, and the procedure to strengthen whistle blowing mechanism in the organization.

This policy:

- Provides a platform and mechanism for the staff and secretary to voice genuine concerns or grievances about unprofessional conduct without fear of reprisal.
- It provides an environment that promotes responsible and protected whistle blowing. It enables Staff and Secretary about their duty to report any suspected violation of any law that applies to the organization and any suspected violation of the Group Values or the organization's Code of Conduct.
- Above all, it is a dynamic source of information about what may be going wrong at various levels within the organization and which will help the organization in realigning the processes and take corrective actions as part of good governance practice.

Coverage of this policy:

This policy is applicable to all the projects operational in various districts including the staff and secretary.

This policy is equally applicable to all stakeholders to report a concern related to a potential violation of the organization's Code of Conduct.

Who is a whistle blower?

Any staff member or secretary who discloses or demonstrates evidence of an unethical activity or any conduct that may constitute breach of the organization's Code of Conduct. This whistleblower has come to the decision to make a disclosure or express a genuine concern /grievance/allegation, after a lot of thought.

Protection:

The process is designed to offer protection to the whistleblower (staff and secretary) provided that the disclosure made / concern raised / allegations made ("complaint") by a whistleblower is in good faith and the alleged action or non-action constitutes a genuine and serious breach of what is laid down in the Code of Conduct.

SSEVS affirms that it will not allow any whistleblower to be victimized for making any complaint. Any kind of victimization of the whistleblower brought to the notice of the organization will be treated as an act warranting disciplinary action.

As an organization, we condemn any kind of discrimination, harassment, victimization or any other unfair employment practice adopted against the whistleblowers. Complete protection will be given to the whistleblowers against any unfair practices like retaliation, threat or intimidation or termination/suspension of service, disciplinary action, transfer, demotion, refusal of

promotion, or the like including any direct or indirect use of authority to obstruct the whistleblower's right to continue to perform his/her duties/functions in a free and fair manner.

Reporting in good faith

Every Whistle Blower is expected to read and understand this policy and abide by it. It is recommended that any individual who wishes to report, do so after gathering adequate facts/data to substantiate the complaint and not complain merely on hearsay or rumour. This also means that no action should be taken against the whistleblower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation. However, if a complaint, after an investigation proves to be frivolous, malicious or made with ulterior intent/motive, the organization should take appropriate disciplinary action against the concerned whistleblower.

Dealing with anonymity

A whistleblower may choose to keep his/her identity anonymous. In such cases, the complaint should be accompanied with strong evidence and data.

Confidentiality

The organization will treat all complaints in a confidential and sensitive manner. In specific cases where the criticality and necessity of disclosing the identity of the whistleblower is important, it may be disclosed, on a 'need-to-know-basis', during the investigation process and only with the prior approval of the whistleblower.

Who is a whistle blower officer?

For the purpose of this policy, the whistle blower officer will be Secretary and program manager would act as the Whistle Blower Officer.

Procedure for raising a complaint

A whistleblower can make a complaint in multiple ways:

1. Can write to the secretary of the organization
2. A whistle blower can send a complaint to the mobile number **91-7903070594** and email: director@ssevs.org

Reporting process

An Annual Report will be prepared by the organization of which the copies will be shared with the board, different committees and projects

Guidelines for communication and implementation of this policy

A dedicated mobile number will be available for reporting of any violation or misconduct. A communication mechanism should be put in place to create awareness about this with the existing staff including new ones.

This policy is equally applicable to all the stakeholders who may wish to report a concern related to a violation / potential violation of the organization's Code of Conduct.

A detailed Operationalizing Guideline will be made available to each committee to ensure that this policy is implemented in letter and spirit.

Amendment

SSEVS reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

Special Circumstance and Exception

Any change to this policy has to be approved by the board.

Non-compliance and consequences

Violation of this policy is subject to disciplinary action, up to and including termination.

Annexure 1 - Template for Reporting Violation

Please select the applicable incident type(s) from the list below that best describes the issue(s) you are reporting. Please note that multiple issues can also be selected:

1.	Misappropriation of SSEVS assets or resources	
2.	Conflict of interest	
3	Inappropriate sharing of confidential information	
4.	Financial fraud of any nature	
5.	Violation of gifts and entertainment policy	
6.	Non-adherence to safety guidelines	
7.	Inaccurate financial reporting	
8.	Bribery & Corruption	
9.	Insider trading including instances of leak or suspected leak of information	
10.	Other forms of Harassment – Victimization, Bullying, Discrimination etc.	
11.	Social Media Usage	
12.	Misuse of authority	
13.	Engagement with any female staff	
14.	Engaging in any other organization other than the existing one	
15.	Others	

Please provide name, designation and department of the person(s) involved?

	Name of the person	Designation	Project
Individual -1			
Individual-2			
Individual-3			
Individual-4			
Individual-5			

When did the incident occur? (Please provide tentative date/month if you do not know the exact date): _____

Please confirm the location of the incident: _____

How did you find out about this incident? _____

How long has this been occurring for?

→ Less than a month

→ 1-6 months

→ 6-12 months

→ More than 12 months

Please provide a detailed description of the incident. To enable SSEVS to act on your complaint, you are requested to provide specific information. Where possible, please include names, location, date, time etc.

Do you have any evidence in support of your allegations?

- ☐ Yes
☐ No

Is anyone else aware of this incident?

- ☐ Yes
☐ No

Is there any additional information that would facilitate the investigation of this matter?

- ☐ Yes
☐ No

Have you reported this incident to anyone in the organization?

- ☐ Yes
☐ No

Date: _____ Location: _____

Name of the Person reporting (optional): _____

Contact Information (including email optional): _____

Siddharth Kumar



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