

Rwanda Scouts Association (RSA)



DISCLOSURE OF MALPRACTICE (WHISTLEBLOWING) POLICY

JULY 2018

Organization:	Rwanda Scouts Association (RSA)
Title:	Disclosure of Malpractice (Whistleblowing) Policy
Author:	Executive Secretariat
Area of Governance:	All Departments
Date for Renewal:	1st July 2019
Approved by:	Board of Directors
Confidentiality:	Not confidential
Geographical Scope:	The policy covers the whole country of Rwanda.

0.1. Policy Statement

At Rwanda Scouts Association, it is vital that everyone who works for and with us maintains the highest standards of conduct, integrity and ethics, and complies with local legislation. If an employee, volunteer, partner, consultant or contractor has any genuine concerns about malpractice in the workplace, we wish to encourage them to communicate these without fear of reprisals and in the knowledge that they will be protected from victimization and dismissal.

This policy concerns all people involved in the Scouting sphere in Rwanda; Board of Directors, members of National Commissions, members of the Districts Boards of Directors, all adults in scouting, volunteers, partners and consultants. Before entering in their functions, they are made aware of the policy and testify it by signing on the form reserved for that purpose.

1.0. Raising a concern

Rwanda Scouts Association uses this policy to enable employees, volunteers, partners, consultants or contractors, to raise or disclose concerns at an early stage and in the right way. It applies in all cases where there are genuine concerns about malpractice in the workplace, regardless of where this may be and whether the information involved is confidential or not

Malpractice includes the issues listed below:

- Financial wrongdoing including theft, bribery, fraud, money laundering and aid diversion
- A failure to comply with any legal obligations
- Sexual misconduct, including sexual abuse, harassment or exploitation.
- Abuse or exploitation of children, vulnerable adults or beneficiaries (see Child Protection Policy)
- Breach of RSA policy
- Abuse of position
- A miscarriage of justice
- Danger to the health and safety of individuals or damage to the environment
- Improper conduct or unethical behavior
- Activity which would bring the organization into serious disrepute
- Concerns related to the compliance of RSA's fundraising practices
- The deliberate concealment of information relating to any of the matters listed above.

If you have a genuine concern and have a reasonable belief it is in the public interest, even if it is later discovered that you are mistaken, under this policy you will not be at risk of losing your job or from suffering any form of retribution as a result.

This assurance will not be extended to an individual who maliciously raises a matter they know to be untrue or who is involved in any way in the malpractice. Those found to be making false allegations maliciously will have disciplinary action taken against them.

2.0. **Procedure**

If you genuinely believe that the actions of someone who works for Rwanda Scouts Association could lead to or has resulted in malpractice, please follow the procedure below.

1. Raise the matter with your leader (Unit Leader, Group Leader, District Commissioner, Chief Commissioner, National Executive Commissioner), who will consult with the appropriate contact point (see below).
2. If you feel that you are unable or uncomfortable to raise the matter with your direct leader, raise it with the next level senior leader, the one level up your leader.
3. If under exceptional circumstances you feel unable to report to anyone in your line of leadership, you may report the matter in confidence directly to **Rwanda Scouts Association's Confidential Reporting/Whistleblowing line:**

⇒ **By email** to whistleblowing_rsa@gmail.com or by phone at **+250789040179**

⇒ **By post** writing to: Rwanda Scouts Association, PO Box 775, Kigali - Rwanda (marking the envelope **Private and Confidential**).

⇒ You can also **drop the envelope** at the Office in Nyamirambo, Rwezamenyo at the Executive Secretariat office.

At the point of raising a concern, it would be useful for you to share information describing:

- Whether anyone is at immediate risk of harm?
- What happened? If possible, make note of dates, times, places, people.
- Who is involved?
- How do you know about it?
- When were you first concerned about it?
- Have you told anybody about it?
- Was any action taken?

All major breaches to policies or major incidents must be reported to the Board of Directors which will act on them after consultation with the disciplinary committee.

3.0. **Obligation to report:**

All leaders at all levels, adults in scouting, interns, volunteers and consultants should:

- Report incidents of theft, fraud, bribery, nepotism, discrimination, harassment or any other form that they strongly believe is a malpractice, immediately to Rwanda Scouts

Association's whistleblowing email whistleblowing_rsa@gmail.com or directly through a phone call to +250789040179.

- Report Safeguarding concerns relating to sexual abuse or exploitation of children, vulnerable adults, beneficiaries or any RSA representative to Rwanda Scouts Association's whistleblowing hotline number (+250789040179) within 24 hours. They can also send a confidential reporting to the whistleblowing email above.

2. A decision will be made on whether it is appropriate to handle such complaints under this policy. Where not appropriate the complainant will be informed and their permission sought to divert the issue to the appropriate procedure either within the Rwanda Scouts Association or outside in the relevant bodies.
3. When matters are reported to the Disciplinary Committee, the relevant Response Plan will be followed. If an investigation is conducted, the outcome may involve taking disciplinary action if misconduct has been proved, which may include dismissal. RSA's disciplinary process is informed by **Code of Conduct**.

You will be notified once the matter has been resolved, but outcomes are subject to confidentiality and may not be communicated.

Rwanda Scouts Association will take appropriate action, which may end in dismissal, in accordance with the relevant procedure against any scout leader, employee, volunteer or consultant who:

- Has been found to be victimizing another individual for using this procedure or deterring them from reporting genuine concerns under it.
- Made a disclosure maliciously that is known to be untrue or without reasonable grounds for believing that the information supplied was accurate.

Frequently asked questions

What if the direct leader is involved in the alleged malpractice in some way?

If the line manager is involved in the alleged malpractice in some way, the matter should be raised with the next senior leader in the scouting line. In case the case involves the Chief Commissioner, the matter is reported to the Deputy Chief Commissioner.

All concerns can be reported through the email whistleblowing_rsa@gmail.com or to the hotline +250789040179.

Can the disclosure be made anonymously?

You are strongly encouraged not to make anonymous disclosures as details and further concerns cannot then be checked with you and this may seriously limit the ability of investigators to pursue your concerns. Nonetheless, all disclosures, made anonymously or otherwise, will be reviewed but lack of information may limit the nature, extent and outcome of the investigation.

Who will conduct the investigation?

Normally, depending on the concern the Board of Directors will appoint an independent person from within Rwanda Scouts Association. On rare occasions, external investigation support may be sought.

What if the matter involves a criminal offence?

The issue may also be reported to the police if a criminal offence, such as fraud or theft, has been committed.

DISCLOSURE OF MALPRACTICE (WHISTLEBLOWING) FLOW CHART

