

# Whistle-blower Procedure

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**Procedure owner: tbd**

Version	Date	Description of Version	Author
1	September 2018	Separation from Complaints' Handling Procedure, establishment of online reporting form and incorporation of flowchart	Nikolaos Koufos
2	November 2018	Incorporation of Arabic misconduct report form	Nikolaos Koufos

## Abbreviations

**BoD** Board of Directors

**HR** Human Resources

**SvB** Supervisory Board

## Purpose

The purpose of this procedure is to ensure that suspected or observed misconduct within SPARK is internally reported and addressed.

## Scope

This procedure is applicable to suspected or observed misconduct, on behalf of SPARK employees (i.e. staff members, interns and volunteers) during their employment at SPARK.

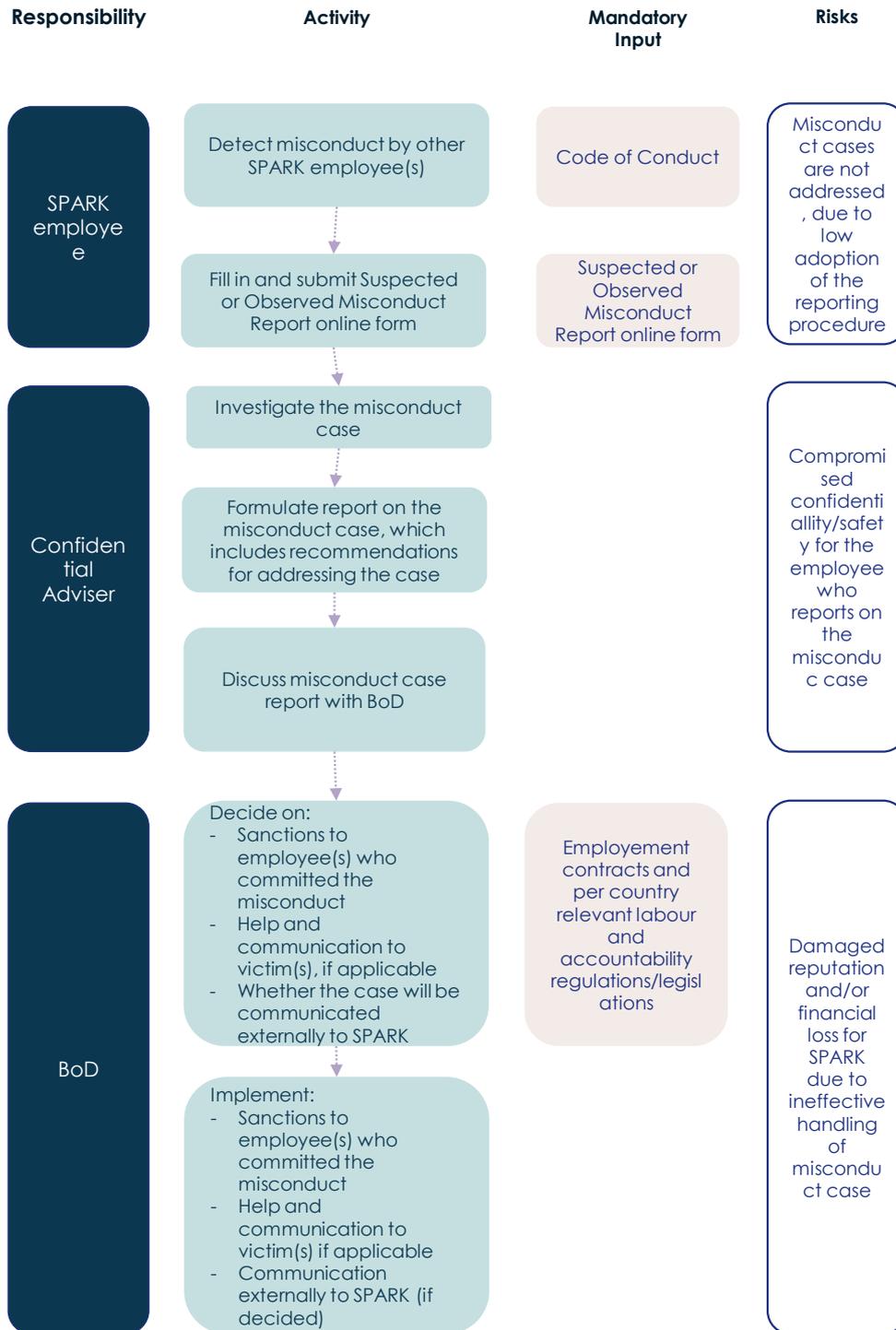
Local partner organisations' staff members and external contractors of SPARK are expected to cooperate in the implementation of this procedure, as per their relevant contracts (including memorandums of understanding) established with SPARK.

For this procedure, misconduct during SPARK employment is defined in SPARK's [Code of Conduct](#).

This procedure however is not applicable to (suspected or observed) fraud and corruption incidents, on behalf of SPARK staff members, interns and volunteers; fraud and corruption incidents are defined and handled through SPARK's [Fraud Prevention and Correction Policy](#).

## Procedure

Suspected or observed cases of misconduct within SPARK are reported and addressed as per the flowchart below:



## **Confidentiality and safety within the procedure**

In order to ensure confidentiality and safety for the SPARK employee(s) who report a (suspected or observed) misconduct case, cases of misconduct are reported within SPARK to a Confidential Adviser, appointed by SPARK's BoD. Currently, the role of Confidential Adviser is assigned to the HR Manager of SPARK.

SPARK employees who file a report in good faith in connection with a case of misconduct within SPARK can be assured that this report will be dealt confidentially and have no contractual consequences for him/her or never constitute a reason for dismissal, suspension, lower grading or other disciplinary measures in his/her employment at SPARK.

Employees who think that they have experienced harmful consequences in connection with a report filed in good faith are kindly requested to inform the Confidential Adviser of this.

The employee who intentionally files an untruthful report will be held liable from SPARK for the losses suffered by the organisation as a result of the untruthful report.

All SPARK employees are kindly advised to report misconduct cases through this [Suspected or Observed Misconduct Report online form](#). An Arabic version of the Suspected or Observed Misconduct Report online form can be found also in [this link](#).

Access to data submitted through these form is given only to the Confidential Adviser and eventually, the BoD.

A reporting of a misconduct through the aforementioned form can be done anonymously or non-anonymously; the SPARK employee reporting a misconduct can decide if he/she wants to indicate or not his/her name in the form. In any case, the emails addresses or IP addresses from those that submit a misconduct case through the online form will not be collected.

However, SPARK kindly advises all its employees to report cases of misconduct by also indicating their names in the form, in order to facilitate the investigation and thereby, resolving of the cases.

## **Exceptions to the procedure**

The reporting of potential cases of (suspected or observed) misconduct committed by the Confidential Adviser can be done by SPARK employees by sending a relevant email or through a phone call to the Co-director of SPARK. In this case, investigation of the case is conducted by the Co-director, by ensuring the confidentiality and safety of the employee who reported the case.

For potential cases of (suspected or observed) misconduct committed by either or both of the BoD members, the Confidential Adviser escalates the case directly to the SvB, without involving either members of the BoD. In this case, the SvB decides on and implements actions for addressing the committed misconduct.