



Whistleblower Policy

This policy is intended to encourage Board members, staff (whether remunerated and volunteers) and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events and activities including, but not limited to behaviors or practices.

Internally

1. The Whistleblower should promptly report the suspected or actual event and/or activities to his/her Supervisor.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to his/her Supervisor, then the Whistleblower could report the event to the next highest or another level of management, including to an appropriate Board committee or member.
3. The Whistleblower can report the event with his/her identity or anonymously eg. by writing an anonymous letter and sharing it with the relevant person.
4. The Whistle blower shall receive no retaliation or retribution for any report made **provided** the same was made in good faith – and without malice to damage or injure any person or the Organization.
5. A Whistleblower who makes a report that is not done in good faith shall be liable for disciplinary action, Including, but not limited to termination or other legal means to protect the reputation of the organization and members of its Board and staff.
6. Anyone who retaliates against the Whistleblower (who reported an event in good faith) shall be subject to disciplinary, including termination from the Board or employee status.
7. Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement Authorities.
8. Supervisors, managers and/or Board members who receive the reports shall promptly act to investigate and/or resolve the issue.
9. The Whistleblower shall within five business days of the initial report receive a preliminary report, regarding the investigation, disposition or actions taken or to be taken towards resolution of the issue.



NAVIGATORS (EPTF) KENYA TRUST
A Ministry of the Navigators Kenya

10. The Whistleblower's being dissatisfied with the investigation report, having been conducted in good faith by internal personnel, then he/she has the right to report the event to the appropriate legal or investigative agency.

11. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to summons by Court or any other competent body in conduct of such investigations.

Externally: in the Field

The Navigators (EPTF) Kenya Trust is committed to lawful and ethical behavior in all of its activities and requires its directors and employees to act in accordance with applicable laws, Christian values and to observe high standards of ethics in the conduct of their duties and responsibilities.

For Transparency, The Navigators (EPTF) Kenya Trust encourages its project participants, partners and other shareholders to share their questions, concerns, suggestions, or complaints. EPTF staff shall support this process by;

- Having stickers in meeting rooms with an email address and phone number through which individuals can share confidential questions, concerns, suggestions, or complaints. The contact information should not be of the person on the ground
- Having a suggestion/ feedback box in all EPTF offices

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