



WHISTLE BLOWER POLICY

Date: December 2, 2020

I. OBJECTIVE

SNEHA has drafted the SNEHA Code of Conduct which lays down principles and standards that govern the actions of the Organisation and its employees and consultants. Any actual / potential violation of the code of conduct, however insignificant or perceived as such would be a matter of serious concern for SNEHA.

In case of violation of SNEHA's code of conduct, we would like to provide a reporting mechanism whereby such violations can be reported, without any fear of backlash or recrimination. In order to provide such a mechanism, SNEHA would like to introduce the "Whistle Blower Policy" which encourages every employee/ consultant to promptly report to the management any actual or possible violation of the code of conduct.

Accordingly, the Whistle Blower Policy has been formulated with a view to provide a mechanism for staff /consultants to approach the relevant authority in the Organisation. It also allows for external stakeholders to report on any malpractices they perceive / experience in their dealings with SNEHA staff and consultants and allows them to speak out if they have real concerns about malpractices at SNEHA and provides protection from victimisation provided that their concerns are genuine and are not raised with any malicious intent.

This policy is designed to enable us to be aware of possible malpractice and to take appropriate steps to deal with it immediately.

II. APPLICATION

This policy is applicable to all employee/ consultant / vendors / external partners of SNEHA

III. DEFINITION

"Protective Disclosure" means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.

Whistle Blower means an employee/ consultant / vendors / external partner making a protective disclosure under this policy.

I. POLICY AND PROCESS

1. SNEHA has put in place a mechanism for confidential raising of concerns about:

- any unlawful activity as per SNEHA's Code of Conduct
- unreported dangers to staff, communities we work in or to SNEHA's reputation
- information about these things is being deliberately concealed.

2. SNEHA introduces a dedicated email address speakup@snehamumbai.org which is available on the intranet and our website to enable employees, consultants or external stakeholders to access and raise a complaint as required.
3. Anyone wanting to report an unlawful activity / violation of SNEHA's Code of Conduct can write to this dedicated email address and record the complaint/incident and give information with whatever details available with the person.
4. The emails sent to this dedicated email address are totally confidential and secure.
5. You will not be required to give your name in order to raise a concern, though you are encouraged to give your name, so we will be able to report back to you the results of any investigations or contact you to request further information (if necessary).
6. Every Complainant 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 whistle blower, if the complaint was made in good faith, but no misconduct was confirmed on subsequent investigation.
7. The Complainant may write the complaint in the format provided in Annexure A and follow process as covered below under section on 'How to make a Complaint'. However, complaint in any format in English, Hindi or Marathi will be accepted under this policy.
8. The complaint should be legible and clear and should not be trivial or frivolous in nature.
9. All concerns reported on the dedicated email id speakup@snehamumbai.org will be heard, investigated and received by SNEHA's Director – Human Resource Management (HRM), who may choose to address the complaint herself or co-opt other members of SNEHA staff or Trustee board to investigate and address the complaint, depending on the nature of the complaint.

In the following cases, Director - Human Resource Management (HRM), should necessarily co-opt a committee to address a complaint:

- A. In case of complaint regarding financial irregularity, violation of laws and regulations: Co-opt a Director /CEO/ Trustee of SNEHA
- B. In case of complaint regarding serious team issues: Co-opt at least one member of senior management (CEO / ED / Program Director/ Associate Program Director/Domain head) and other staff as is deemed necessary

- C. In case of complaints related to Human Resource Management or Administration department: Co-opt at least one member of senior management (CEO / ED / Program Director/ Associate Program Director/Domain head) and other staff as is deemed necessary
- D. In case of complaints against CEO / ED: Co-opt a member of SNEHA Trustee Board

Complainant also has the option to send complaint directly to CEO/ED with a request to address it under Whistle Blower Policy

- 10. In case of complaints on sexual harassment at the workplace, complaint is to be forwarded to SNEHA's Chairman – POSH Committee
- 11. SNEHA's Director – Human Resource Management will maintain a log of all complaints received and action taken, as per the policy
- 12. Complaints will be investigated within a pre-determined timeframe. i.e. 60 days from the day the complaint has been received on email or through physical letter
- 13. Investigations will be treated as a neutral fact finding process. The identity of the complainant and the person/(s) against whom complaint has been recorded will be kept confidential.
- 14. The person/(s) against whom complaint has been recorded will normally be informed about the complaint (depending on the sensitivity of the situation) at an appropriate time and will have the opportunity to provide their inputs and clarifications during the investigation.
- 15. If the allegation is proved to be false or malicious, action may be recommended against the Complainant as deemed fit by the Director-HRM or committee formed to investigate the complaint. However, the mere inability to substantiate a complaint or provide adequate proof does not constitute grounds for taking action against the Complainant. Action can be taken against witnesses who give false evidence or produce any forged or misleading document, as recommended by the Director- HRM or the committee formed by her/him to investigate the complaint.
- 16. Where there is a need for any additional facts, the Director-HRM is authorized to nominate internal or external persons to undertake fact finding or make the necessary enquiries. The Director-HRM / Committee may also undertake any other means they deem appropriate to arrive at the facts or get information relevant to the case. This may include personal interviews with concerned employees, asking for documents or records, etc.
- 17. Failure or refusal of any persons to co-operate, or to disturb or misguide the Director-HRM / committee during its investigations may result in disciplinary action against such persons as deemed appropriate by the Director-HRM / Committee.

18. The nature and severity of disciplinary action against the guilty will be in direct proportion to the seriousness of the offence. This could range from but will not be limited to:
- A letter of warning that will be placed in the personnel file.
 - Immediate transfer or suspension without pay or both.
 - Dismissal/ termination from the services of SNEHA.
 - Withholding of promotion, increments or both
 - Undergoing counselling
 - Any other disciplinary action that the Director-HRM / committee formed to address a complaint, may deem fit.
19. The Director-HRM / Committee formed to address a complaint shall handle all reports sensitively and fairly.
20. Any complainant (if identity reported) will not suffer any retribution/detriment whatsoever following a call from them of this nature, and any such harassment or victimisation will not be tolerated. As long as you are acting in good faith and your concerns are genuine, you are protected from victimisation and will not be at risk of losing your job or suffering any form of retribution as a result of raising a concern, even if you are mistaken.
21. Feedback should be given to the person who has raised the complaint (if identity is disclosed) within 60 days of receipt of the complaint.
22. Feedback should be given to the person against whom investigation has been carried out in writing by the Director-HRM / Committee formed to address the complaint ,within 60 days of receipt of the complaint.
23. The Organisation already has existing grievance procedures that cover employment and team issues for which "Grievance " boxes are placed in all offices / centers. These processes are unaffected by the 'Whistle Blower' policy and should continue to be used

How to make a Complaint?

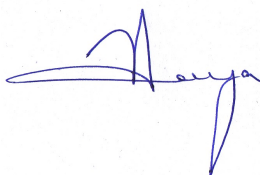
1. A complainant who intends to file a complaint is required to send an email or a physical letter as a mode of written complaint, along with supporting documents and details of the complaint and evidences, to the email address speakup@snehamumbai.org or a physical letter to Director-HRM, SNEHA, Shastri Nagar, Santa Cruz (W) Mumbai 400054 within 1 week from the date of the incident and in case of a series of incidents, within a period of 1 month from the date of the last incident. More prompt the complaint is, more authentic can it be treated.

2. In instances where sufficient cause is demonstrated by the complainant for the delay in filing the complaint, the Director-HRM may extend the timeline for filing the complaint, for reasons to be recorded in-writing.
3. Complainants are advised to file complaint as per format in Annexure A and must keep in mind the following:
 - The written complaint should be sent by **email to speakup@snehamumbai.org or physical letter to be mailed to Director-HRM, SNEHA, Behind building No.11, BMC Colony, Shastri Nagar, Santa Cruz (W) Mumbai 400054**
 - The complaint should be concise, i.e. it should be written in simple language which can be understood easily. Complaints maybe written in English, Hindi or Marathi
 - Details of exact incident, date and time, evidence etc. to be included
 - Circumstances preceding and following the incident to be recorded
 - Attach as many documents as possible in whatever format i.e. relevant e-mails, screenshots of SMS's/whatsapp messages, call details, photographs, recordings etc.
 - Details of the person/(s) against whom complaint is being filed including name, designation, SNEHA office/center where person/(s) are working, contact numbers or email address, if known
 - Do not state anything that is false or incorrect
 - Please note, in case complainant name is not mentioned, the Director -HRM will be unable to respond directly to complainant on results of investigation or action taken.

This policy is applicable with effect from December 2 2020.

We urge all SNEHA employees, consultants and third parties to use the Whistle Blower Policy to report on any incident that will put SNEHA, it's staff or community at risk.

Regards



Vanessa D'Souza
Chief Executive Officer

ANNEXURE A

FORMAT FOR COMPLAINT UNDER WHISTLEBLOWER POLICY 2020

Please send complaint to EMAIL ADDRESS: speakup@snehamumbai.org or mail your complaint letter to: **The Director – Human Resource Management, SNEHA, Behind build no.11, BMC Colony, Shastri nagar, Santa Cruz(W) Mumbai 400054M**

Date:

Sub:

I/We would like to report an incident under the 'Whistleblower Policy' for investigation and action, as deemed appropriate

Name of Person/(s) against whom complaint is being made / Persons involved:

Date of Incident (first known occurrence):

Location/ SNEHA Office / Center where incident occurred:

Details of complaint:

(Please try and give as much information to support the investigation, including when the incident first occurred, circumstances preceding and succeeding the incident; attach supporting documents like email, whatsapp messages, phone call details, photographs etc with details to support your complaint)

Name of the person/(s) making complaint:

Address/SNEHA office or center of person/(s) making complaint

Contact number of person/(s) making complaint:

N.B: Please note, in case complainant name is not mentioned, while action will be taken we will be unable to respond to complainant on results of investigation or action taken.

