



GOVERNANCE • POLICY 09

Whistleblowing and Protected Disclosure Policy

How to raise a serious concern about wrongdoing at CYEF, and the protection you receive for doing so.

Document	Whistleblowing and Protected Disclosure Policy
Version	1.0
Owner	CYEF Board of Directors
Date adopted	pending board adoption
Review cycle	Reviewed every two years
Applies to	Staff, board members, coaches, volunteers, contractors, partners, participants and community members

1. Purpose

Wrongdoing is most often discovered by someone on the inside who noticed and decided to say something. Whether they say it depends almost entirely on whether they believe it is safe to do so.

This policy makes it safe. It tells anyone connected to CYEF how to raise a serious concern, what will happen next and what protection they have.

2. What this covers

- Harm or risk of harm to a child or vulnerable person
- Fraud, theft, misuse of funds, false accounting or misuse of donations
- Bribery, kickbacks or corruption in procurement or recruitment
- Sexual exploitation, abuse or harassment by anyone connected to CYEF
- Discrimination, bullying or victimisation
- A breach of the law, of CYEF policy or of a funder's conditions
- Serious risk to health or safety
- Deliberate concealment of any of the above

Safeguarding concerns about a child follow the Incident Reporting and Escalation Procedure, which is faster. Use this policy where that route is blocked, where the concern is about how CYEF itself is behaving or where you are worried about the consequences of speaking up.

This policy is not for personal grievances about your own treatment at work. Those go through the HR and Volunteer Management Policy. It is also not the route for a service complaint, which goes through the Complaints and Feedback Policy.

3. Your protection

The commitment

Anyone who raises a concern honestly and in good faith is protected, whether or not the concern turns out to be well founded. You do not need proof. You need a genuine belief and a reasonable basis for it.

- You will not be dismissed, disciplined, demoted, excluded from activities or treated less favourably for raising a concern
- Retaliation against someone who has raised a concern is itself a serious disciplinary matter
- Your identity is kept confidential unless you agree otherwise, or unless disclosure is required by law or to protect a child

- If confidentiality cannot be maintained, you will be told before your identity is shared and supported through what follows
- Volunteers, participants, partners and community members receive the same protection as employees

Protection does not extend to a report made maliciously or in the knowledge that it is false. That is a disciplinary matter in itself. A concern that is honestly held and turns out to be mistaken is not.

4. How to raise a concern

4.1 Routes

Step	Who	When to use it
1	Your line manager or programme lead	Ordinary first step where the concern does not involve them
2	Safeguarding Focal Person — info@chipukeezyfoundation.org	Anything involving a child or a vulnerable person
3	Board Chair	Concerns about senior staff, about the founder, about finances or where routes 1 and 2 are unsuitable
4	Full board	Concerns about the Board Chair
5	External bodies	Where internal routes have failed, or where the matter is criminal

4.2 External routes

- **Childline Kenya, 116** — toll free, 24 hours, for anything involving a child
- **Police, 999 or 112** — where a criminal offence may have been committed
- **Ethics and Anti-Corruption Commission** — bribery and corruption
- **Office of the Data Protection Commissioner** — misuse of personal data, odpc.go.ke
- **The relevant funder** — where the concern involves misuse of restricted funds

You are not required to exhaust internal routes before going externally where a child is at risk or a crime may have been committed.

4.3 What to include

- What happened, when and where
- Who was involved
- Whether anyone is currently at risk

- Any documents or messages that support the concern, without putting yourself at risk to obtain them
- Whether you have told anyone else

Do not investigate yourself, confront the person concerned or gather evidence covertly. Report what you know.

5. What happens next

Stage	Timescale
Acknowledgement of your concern	Within 5 working days
Initial assessment and decision on how to proceed	Within 10 working days
Investigation completed, or an update if it will take longer	Within 30 days
Outcome communicated to you, so far as confidentiality allows	On completion

Where a child is at risk, protective action happens immediately and does not wait for these timescales.

An investigation is carried out by someone independent of the concern. Where the matter involves a board member or the founder, the board appoints an external investigator. The person the concern is about is treated fairly and told of the allegation at the appropriate point, unless doing so would place someone at risk or prejudice an investigation.

6. Anonymous reports

CYEF accepts anonymous reports and takes them seriously. Anonymity limits what can be done, because there is no way to ask follow-up questions or to give you an outcome. Where you are worried about being identified, consider raising the concern confidentially rather than anonymously, so that CYEF knows who you are but keeps it protected.

7. Records and reporting

- All disclosures are logged, including those found to be unsubstantiated
- Records are held securely by the Board Chair, separately from personnel files, under the Data Protection Policy
- The board reviews anonymised disclosure trends at least annually
- Where a disclosure reveals a weakness in CYEF systems, the relevant policy is changed and the change is recorded
- Serious matters are reported to relevant funders where their conditions require it

8. If you are not satisfied

If you believe your concern has not been handled properly, you may take it to the full board and after that to the external bodies listed above. Raising a matter externally after an inadequate internal response does not remove your protection under this policy.

Read alongside the Child Safeguarding and Child Protection Policy, the Incident Reporting and Escalation Procedure, the Anti-Fraud, Bribery and Corruption Policy and the Complaints and Feedback Policy.