



## Civil Resource Development and Documentation Centre (CIRDDOC) Nigeria

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# WHISTLE BLOWING POLICY

Founding Chairman: Late Chief (Engr.) Victor U. Nwankwo (Ugwumba)

**Board of Trustees:** Elizabeth Onwuagha (CHAIRPERSON) Prof. C. O. Okonkwo, MFR Prince (Engr.) Ralph Ndigwe JP, Mrs. Izeduwa Derex-Briggs, Ral Nwankwo-Obiona  
**Advisory Board:** Hon. Justice A. G. Karibi-Whyte, CON; Hon. Justice C. C. Nweze, Ph. D; Barr. (Mrs.) Azuka Azinge, Barr (Mrs.) Merce Momeni

## **A. INTRODUCTION**

Civil Resource Development and Documentation Centre (hereinafter referred to as CIRDDOC) is an independent, non-governmental and not-for-profit organisation established in 1996 for the protection and promotion of human rights and women's human rights and the strengthening of civil society. CIRDDOC is also committed to the institutionalization of good governance, gender equality and the rule of law in Nigeria. CIRDDOC is registered under Part C of Companies and Allied Matters Act laws of the Federation of Nigeria 1990. (RC 10,928).

CIRDDOC requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the CIRDDOC, honesty and integrity and compliance with all applicable laws and regulations must be fulfilled.

## **B. COMMENCEMENT:**

This Policy shall commence on the 13<sup>th</sup> day of November, 2019 upon approval by the Board of Trustees and when Executive Director adopts and executes same.

## **C. APPLICATION OF THIS POLICY:**

This policy shall apply to all Board of Trustee members' including the Executive Director, all staff members (paid, unpaid, professional, part-time, volunteers, NYSC corp attaches, temporary and/or permanent), downstream partners, or any person or persons working for or on behalf of CIRDDOC as an organization.

## **D. RESPONSIBILITIES:**

Responsibilities under this Policy shall be divided into general and specific responsibilities to wit;

### a.) General

- (1) Every Agent of CIRDDOC is responsible for the strict adherence of this policy.
- (2) Every individual governed under this policy is under obligation to report any breach in compliance with the procedure stated hereunder.

b.) Specific

- (a) The Board of Trustees, through the Executive Committee, has responsibility to review this Policy, at least annually in consultation with the head of the Legal department and Executive Committee;
- (b) The Executive Committee and the Head of the Legal Department are responsible for proposing relevant and adequate administrative processes to enhance implementation of this Policy; and
- (c) The Executive Director shall conduct regular internal audits to test the adequacy of and compliance with prescribed policies.

**E. PURPOSE OF THE POLICY:**

This Whistle-Blower Policy is intended:

1. To encourage and enable employees and others to raise serious concerns internally so that CIRDDOC can address and correct inappropriate conduct and actions.
2. To protect staff, children, vulnerable adults and indigent persons who come in contact with the organization or may directly or indirectly benefit from the services/projects of the organisation.
3. To ensure that staff, volunteers, and members of the Board of Trustees are guided by overarching principles of safeguarding, in the discharge of their responsibilities.
4. To enhance financial accountability with respect to any project executed by the organization.
5. To maintain fair play within the organization.
6. To promote checks and balances within the organization with respect to all activities of the organization.

**F. REPORTING RESPONSIBILITIES**

It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of CIRDDOC's code of ethics or suspected violations of law or regulations that govern CIRDDOC's operations.

## **G. NO RETALIATION**

It is contrary to the values of CIRDDOC for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of CIRDDOC. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

## **H. ACTING IN GOOD FAITH**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## **I. CONFIDENTIALITY**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **J. GUIDES AND PROCEDURES FOR WHISTLE BLOWING**

### **(a) Reporting Procedure**

CIRDDOC has an open-door policy and suggests that employees freely share their questions, concerns, suggestions or complaints. Supervisors and managers who receive complaints or concerns about suspected ethical and legal violations are required to report same in writing to the Executive Director. Employees with concerns or complaints may report same via the Safe-Guarding Policy detailed below.

(b) Safeguarding

1. CIRDDOC shall put in place a Complaint/Suggestion Box at appropriate designated positions within and outside the organisation's administrative building.
2. The location of the Complaint/Suggestion Boxes shall be accessible to all, including children, vulnerable adults and indigent persons.
3. The Complaint/Suggestion Box shall be checked frequently by a designated trusted staff member of the organization, selected by consensus.
4. Any submitted complaint shall be acted upon within 7 days of the said complaint without victimising the complainant.
5. There shall be the inscription on the Complaint/Suggestion Boxes to wit; "NO REPRISAL FOR A COMPLAINANT".
6. Where a complaint is made against the staff member selected to check the Complaint/Suggestion Box, the complaint sheet shall be made directly to the Operational Manager of CIRDDOC for fair treatment of the complaint, in line with the principles of Natural Justice and fair hearing.
7. No individual governed under this policy shall be referred to as a meddlesome interloper.
8. It shall be proper for a complaint to be made orally or in written form and addressed to the Executive Director directly or any other staff or volunteer of CIRDDOC.
9. Where Complaints are made in compliance with No 7 above, but not made to the Executive Director, such complaint must be forwarded to the Executive secretary within 24 hours, except where the complaint was made against the Executive Secretary; it shall be directed to the Project manager or Executive Director of CIRDDOC.

**K. SPECIAL PROCEDURE FOR CRIMINAL-RELATED COMPLAINTS**

This special procedure applies when the subject of the complaint is criminal-related in nature, such as Financial Fraud and Misconduct, Sexual Harassment, Sexual Exploitation or Sexual Abuse because such complaints contemplate the commission of crime.

1. The complainant reporting any criminal-related conduct, such as financial fraud, shall submit the said complaint in a written form and address same to the Executive Director. A copy of said complaint should be provided to the Executive Secretary and the Commissioner of Police of the State of operation based on the circumstance of the case.
2. Where the complaint is not made against the Executive Director, the Executive Director within 7 days of the receipt of the complaint, constitute a "Whistle Blowing Committee" made up of three (3) persons to investigate the complaint and refer their outcome to the Executive Director within 10 days of constitution of the committee.
3. The Whistle Blowing committee shall invite the affected person or persons and the complainant to comply with the principle of fair hearing upon which a verdict shall be reached and transmitted to the Executive Director.
4. The Executive Director, upon the receipt of the Whistle Blowing committee's recommendation, shall exercise administrative discretion by reporting the matter to the police for the arrest of the suspect or resolve the matter administratively by placing the affected person under disciplinary sanctions.
5. Where the complaint is made against the Executive Director, it shall be referred to the Chairperson of Board of Trustees, copying the Police and the Executive Director.
6. Where the complaint is made against the Chairperson of the Board, it is the responsibility of the Board of Trustees to call for an emergency meeting of the Board within 21 days of service of the complaint on the Chairperson of the Board.
7. Prior to the emergency meeting of the Board, the Chairperson of the Board shall invite the Executive Director and where necessary, also the complainant to the Board meeting to test the veracity of the complainant's complaint in compliance with the principles of natural justice and fair hearing.
8. The Board upon the hearing of the complaint, and conducting an independent investigation into the complaint, may either indict or exonerate the Executive Director from criminal liabilities with respect to the said complaint.
9. Where the Executive Director is indicted, the Board of Trustees may either refer the matter to the Police for prosecution or sanction the Executive Director accordingly.

10. Finally, where the Executive Director is exonerated from the Compliant, there shall not be any form of reprisal for the complainant in compliance with this Policy.

### **CONTACT INFORMATION**

**EXECUTIVE DIRECTOR:**

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*November 13, 2019*

Barrister (Mrs.) Ral Nwankwo-Obioha

Executive Director,

CIRDDOC Nigeria