



WHISTLEBLOWING POLICY

2026

NON-PROFIT ORGANISATION

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1. Purpose and Commitment

NAMBI FOUNDATION is a non-profit organisation committed to integrity, responsible use of resources, safeguarding and respectful conduct in every part of its work.

This Policy provides a safe and structured way for people to raise serious concerns about conduct connected with NAMBI FOUNDATION. It explains what may be reported, how a report can be made, how concerns are assessed and investigated, and how people who speak up in good faith are protected.

NAMBI FOUNDATION encourages concerns to be raised early. A person does not need to prove wrongdoing before making a report. It is enough to have a reasonable and honest concern that something improper may have happened, may be happening or may be likely to happen.

2. What Whistleblowing Means

Whistleblowing is the reporting of suspected serious misconduct, unlawful behaviour, abuse of authority, safeguarding concerns, financial wrongdoing or other conduct that could harm people, the Foundation, its resources or the integrity of its work.

Whistleblowing is intended for matters that go beyond ordinary disagreement or dissatisfaction. It is a mechanism for bringing significant concerns to the attention of a person who can assess them independently and arrange an appropriate response.

Raising a genuine concern is considered an act of responsibility and should never be treated as disloyalty to NAMBI FOUNDATION.

3. Who May Raise a Concern

A whistleblowing report may be made by anyone who has information about conduct connected with NAMBI FOUNDATION, including:

- employees
- volunteers
- interns
- consultants and contractors
- board or governing body members
- partner organisations
- suppliers and service providers
- programme participants and recipients of assistance
- community members; and
- other people who have interacted with NAMBI FOUNDATION or its representatives.

A report may concern current or past conduct if the matter remains relevant to safeguarding, accountability, legal compliance or organisational integrity.

4. Concerns That Should Be Reported

Whistleblowing may be used to report suspected serious misconduct such as:

- fraud, theft or embezzlement
- bribery or corruption
- misuse of donations, programme funds or other Foundation resources

- serious conflicts of interest
- falsification of records or financial information
- sexual exploitation, abuse or harassment
- child safeguarding violations
- violence, serious bullying, intimidation or discriminatory abuse
- trafficking, exploitation or forced labour
- abuse of authority or position
- retaliation against a person who has raised a concern
- serious breaches of confidentiality or misuse of sensitive information
- conduct that creates a serious health, safety or security risk
- intentional concealment of significant wrongdoing
- serious violations of NAMBI FOUNDATION policies; or
- conduct that may constitute a criminal or other unlawful act.

This list is not exhaustive. A concern may be reported whenever a person reasonably believes that conduct connected with NAMBI FOUNDATION creates a serious ethical, safeguarding, financial, legal or organisational risk.

5. Matters That May Be Handled Through Other Channels

Not every concern requires a formal whistleblowing process.

Routine workplace disagreements, ordinary performance questions, scheduling matters, minor interpersonal conflicts and other day-to-day management issues should normally be raised with the relevant manager or through the appropriate internal process.

Programme participants may also use established feedback or complaints channels for questions about programme eligibility, service quality, distribution arrangements or other operational matters that do not involve serious misconduct.

If a concern initially appears minor but later indicates possible serious wrongdoing, it should be transferred to the whistleblowing process.

No person should be prevented from using the whistleblowing channel merely because another reporting route may also be available.

6. How to Report a Concern

The primary whistleblowing contact for NAMBI FOUNDATION is:

Eliška Ciria
Director, NAMBI FOUNDATION
director@nambifoundation.com

Reports may be submitted by email. A person may also request a confidential conversation with the Director in order to explain the concern verbally.

A report should be sent directly to the whistleblowing contact rather than circulated widely. Limiting unnecessary distribution helps protect confidentiality and the integrity of any subsequent review.

If the concern relates directly to the Director, or if reporting to the Director would create a reasonable conflict of interest, the matter should be reported to the NAMBI FOUNDATION Board or governing body through an appropriate member who is not involved in the concern.

7. Anonymous Reporting and Confidentiality

NAMBI FOUNDATION will consider anonymous reports where sufficient information is available to assess the concern.

Providing a name may make it easier to ask follow-up questions and provide feedback, but a person is not required to identify themselves where they do not feel safe doing so.

The identity of a whistleblower will be protected as far as reasonably possible. Information will be shared only with people who need it for safeguarding, assessment, investigation, decision-making or legal reasons.

Absolute confidentiality cannot always be guaranteed. In some circumstances, information may need to be disclosed because of legal obligations, immediate safety concerns or the practical requirements of a fair investigation. Where appropriate, the person who made the report should be informed before such disclosure occurs.

8. What Information to Include

A report should provide as much relevant information as the person reasonably has available.

Useful information may include:

- what happened or may happen
- who was involved
- when and where the conduct occurred
- how the person became aware of the matter
- whether anyone may be at immediate risk
- whether money, property, data or programme resources may be affected
- whether there are witnesses
- whether documents, messages, photographs, records or other evidence exist; and
- whether the concern has already been reported elsewhere.

A whistleblower should not put themselves or anyone else at risk in order to obtain evidence. They are not expected to investigate the matter themselves.

9. Immediate Safeguarding or Safety Risks

Where a report indicates that a child, adult or other person may face immediate danger, protection of that person takes priority over normal administrative steps.

NAMBI FOUNDATION may take urgent protective action before the full facts have been established. This may include restricting contact with programme participants, changing duties, suspending access to facilities or systems, arranging medical or psychosocial support, or contacting appropriate protection or emergency services.

Temporary protective action does not by itself mean that wrongdoing has been proven.

Safeguarding concerns should also be managed consistently with the NAMBI FOUNDATION Safeguarding Policy and Framework.

10. Receipt and Initial Assessment

NAMBI FOUNDATION will aim to acknowledge an identifiable whistleblowing report within five working days, unless doing so could create a safety or confidentiality risk.

The Director, or another appropriately appointed person where a conflict exists, will conduct an initial assessment to determine:

- whether the matter falls within this Policy
- whether urgent protective action is required
- whether further information is needed
- whether the matter can be resolved through another appropriate process
- whether a formal investigation is required; and
- whether legal, safeguarding, financial or specialist advice should be obtained.

The initial assessment should be proportionate to the seriousness and complexity of the concern.

11. Investigation Process

Where further investigation is required, NAMBI FOUNDATION will appoint a suitable person or team with sufficient independence, competence and authority to examine the concern.

An investigator should not have a personal interest in the outcome or a relationship that could reasonably call their impartiality into question.

An investigation may involve:

- reviewing documents and records
- examining financial or programme information
- interviewing the person who raised the concern where possible
- speaking with witnesses
- interviewing the person or persons named in the report
- seeking specialist advice; and
- considering relevant Foundation policies, contracts and legal obligations.

Investigations should be appropriately documented and completed without unnecessary delay. The time required will depend on the seriousness, complexity, location and availability of evidence.

NAMBI FOUNDATION will aim to keep an identifiable whistleblower reasonably informed about the progress of the process, while respecting confidentiality and the rights of other people involved.

12. Fairness and Due Process

A whistleblowing report is an allegation or concern, not proof of wrongdoing.

People named in a report must be treated fairly and with dignity. Where a formal investigation is conducted, they should normally be informed of the substance of the allegations and given a reasonable opportunity to respond before final conclusions are reached.

Investigators should consider evidence objectively and should seek information that may both support and contradict an allegation.

No disciplinary conclusion should be based solely on assumption, personal dislike, rumour or an untested allegation.

Temporary safeguards may nevertheless be introduced before an investigation is completed where

this is reasonably necessary to protect people, preserve evidence or reduce organisational risk.

13. Protection From Retaliation

NAMBI FOUNDATION prohibits retaliation against a person who raises a concern honestly and in good faith, assists another person in making a report, provides information during an investigation or otherwise participates appropriately in the whistleblowing process.

Retaliation may include:

- threats or intimidation
- bullying or harassment
- unjustified dismissal or removal from duties
- unfair reduction of responsibilities or opportunities
- withholding legitimate programme support
- adverse treatment in recruitment, contracting or partnership decisions
- pressure to withdraw or change a report; or
- other harmful action taken because a person raised or supported a concern.

A person who believes they are experiencing retaliation should report it immediately to the whistleblowing contact or, where the Director is involved, to the Board or governing body.

Confirmed retaliation may itself constitute serious misconduct.

14. Outcomes and Corrective Action

An investigation may conclude that:

- the concern is substantiated
- the concern is partly substantiated
- the available evidence is insufficient to reach a conclusion; or
- the concern is not substantiated.

Where wrongdoing is established, NAMBI FOUNDATION may take action proportionate to the circumstances.

Possible measures may include:

- changes to procedures or internal controls
- additional supervision or training
- formal warning or other disciplinary action
- restriction or reassignment of duties
- suspension
- termination of employment, volunteering, consultancy or another contractual relationship
- termination or review of a partnership or supplier relationship
- recovery or protection of Foundation assets
- support or remedy for affected persons; and
- referral to an appropriate authority where required or justified.

Corrective action should address not only individual misconduct but also any organisational weakness that allowed the issue to occur.

15. Reports Made in Good Faith and Deliberately False Reports

A person will not be penalised merely because a concern raised in good faith is not confirmed by an investigation.

Whistleblowers are expected to report honestly and to distinguish, where possible, between facts they personally know and information they have heard from others.

Knowingly fabricating an allegation, deliberately providing false evidence or maliciously using the reporting process to harm another person is not protected by this Policy and may result in appropriate action.

A report that turns out to be mistaken is not the same as a deliberately false report.

16. Reports From Programme Participants, Partners and the Public

NAMBI FOUNDATION accepts serious misconduct reports from people outside the organisation, including programme participants, community members, partners, contractors, suppliers and members of the public.

Where a staff member or volunteer receives a serious allegation from a programme participant or another external person, they should not conceal it or attempt to investigate it personally. The concern should be passed promptly to the appropriate reporting channel.

A person raising a concern about NAMBI FOUNDATION should not lose legitimate access to assistance or services simply because they made a complaint or whistleblowing report.

Where a report is primarily programme feedback rather than an allegation of misconduct, NAMBI FOUNDATION may redirect it to the relevant complaints or feedback process while ensuring that any safeguarding or integrity issues are not overlooked.

17. Records, Privacy and Information Security

Whistleblowing reports and investigation records must be handled as sensitive information.

NAMBI FOUNDATION should maintain secure records of significant reports, the actions taken and the outcome of the process.

Access should be limited to people with a legitimate role in receiving, assessing, investigating or overseeing the matter.

Records should be accurate and should distinguish between allegations, evidence, findings and decisions.

Personal information should be processed in accordance with applicable privacy and data protection requirements and retained only for as long as reasonably necessary or legally required.

18. Responsibilities Within NAMBI FOUNDATION

Everyone representing NAMBI FOUNDATION has a responsibility to support a culture in which serious concerns can be raised without fear.

Employees, volunteers and other representatives should:

- report serious misconduct when they become aware of it
- cooperate honestly with legitimate investigations

- maintain confidentiality
- avoid interfering with evidence or witnesses; and
- never retaliate against a person who raises a concern.

Managers have an additional responsibility to take concerns seriously and ensure they are passed to the appropriate person rather than ignored, concealed or handled informally when a formal response is required.

The Director is responsible for maintaining the primary whistleblowing channel and ensuring that reported concerns are assessed appropriately, except where the Director is personally involved or otherwise conflicted.

The Board or governing body provides oversight for serious matters involving senior leadership and for situations in which independent escalation is necessary.

19. Review and Final Commitment

This Policy should be reviewed periodically and updated when organisational growth, changes in programmes, legal developments or lessons from actual cases make revision appropriate.

NAMBI FOUNDATION believes that accountability depends on people being able to speak when something appears wrong.

The Foundation is committed to receiving genuine concerns respectfully, protecting people who report in good faith, examining allegations fairly and acting when misconduct is established.

Whistleblowing is one part of a wider culture of integrity. It works best when ethical conduct, safeguarding, transparency and responsible leadership are part of everyday organisational practice.