



CS-SUNN

Civil Society-Scaling Up Nutrition In Nigeria

WHISTLE BLOWING POLICY



ACKNOWLEDGEMENT

CS-SUNN would like to express our special thanks and gratitude to all those that worked tirelessly to ensure that the development and adoption of this policy was actualized starting with our Board of Trustees, the Steering Committee, Staff at the National Secretariat and our Consultant who provided the needed legal insights.

AUTHORIZATION

Version/Classification:

Author:

Reviewed By:

Approved By:

Approval Date:

Next Review Date:



INTRODUCTION

The Civil Society – Scaling Up Nutrition in Nigeria (CS-SUNN) is a non-governmental, non-political, non-partisan, non-religious, non-tribal, non-racial and non-profit making alliance, made up of organizations with a shared vision to transform Nigeria into a country where every citizen has food and is nutrition secured. CS-SUNN pursue this lofty goal by engaging government and non-state actors to raise awareness, sustain commitment and actions to effectively tackle under-nutrition in Nigeria. The Alliance is fully committed to the principles of excellence, honesty, accountability, commitment, ownership, recognition and professionalism in the delivery of her mandate. All members and staff are expected to conduct the businesses of CS-SUNN with high level of probity and utmost good faith.

CS-SUNN has thus made for herself the following policy to guide the conduct of her staff and representatives and ensure appropriate ethical standards are followed in her work environment, particularly in relationships between staff and in staff/representatives' interactions with non-staff.

CS-SUNN made this policy pursuant to Sections 36(1) & (2), and 42(1) of the Constitution of the Federal Republic of Nigeria (1999) (as amended), and the Companies and Allied Matters Act, Cap. C20 Laws of the Federation of Nigeria, 2004; CS-SUNN Constitution (as amended) 2021; Freedom of Information Act, Cap.C21, Laws of the Federation of Nigeria and Nigeria's Whistle Blowing Policy.

CS-SUNN shall apply the provisions of this Policy in all cases regarding the conduct of her staff and representatives as defined in this Policy.



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SECTION ONE



1.0 PURPOSE

1.1. Civil Society Scaling Up Nutrition in Nigeria {CS-SUNN} requires members, 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 CS-SUNN, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. In line with that commitment, we expect employees, and others that we deal with, who have serious concerns about any aspect of the management's work to come forward and voice those concerns. It is recognized that most cases will have to proceed on a confidential basis.

1.2. This policy document makes it clear that you can do so without fear of victimization, subsequent discrimination or disadvantage. This whistle-blowing policy is intended to encourage and enable employees to raise serious concerns within CS-SUNN rather than overlooking a problem or 'blowing the whistle' outside.

1.3. The policy applies to all employees and those contractors working for CS-SUNN and within the organization's premises, for example, daily wage workers etc. It also covers suppliers and those providing services under a contract with CS-SUNN in their own premises.

1.4. These procedures are in addition to CS-SUNN's Compliance/Grievance procedures and other statutory reporting procedures. CS-SUNN's Human Resource Unit is responsible for making members, employees and service users aware of the existence of these procedures.



SECTION TWO



2.0 REPORTING RESPONSIBILITY

2.1. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that CS-SUNN can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of CS-SUNN's code of ethics or suspected violations of law or regulations that govern CS-SUNN's operations.



SECTION
THREE



3.0 . NO RETALIATION

3.1. It is contrary to the values of CS-SUNN for anyone to retaliate against any 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, suspected fraud, or suspected violation of any regulation governing the operations of CS-SUNN. 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.



SECTION
FOUR



4.0 . REPORTING PROCEDURE

4.1. As a first step, you should normally raise concerns with your immediate manager/ their superior/line Manager or HR. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.

4.2. Concerns may be raised verbally or in writing. Staff who wish to make a written report are invited to use the following format:

- a). the background and history of the concern (giving relevant dates);
- b). the reason why you are particularly concerned about the situation.
- c). the earlier you express the concern the easier it is to take action.

4.3. Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern. If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

4.4. You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.



SECTION
FIVE



5.0 COMPLIANCE OFFICER

5.1. CS-SUNN's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Secretary and/or the Steering Committee of all complaints and their resolution and will report at least quarterly to the Steering Committee on compliance activity relating to accounting or alleged financial improprieties.



SECTION SIX



6.0 ACCOUNTING AND AUDITING MATTERS

6.1. CS-SUNN's Compliance Officer shall immediately notify the Audit Committee/Steering Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.



SECTION
SEVEN



7.0 ACTING IN GOOD FAITH

7.1. 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.



SECTION EIGHT

8.0 CONFIDENTIALITY

8.1. 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.



SECTION
NINE

9.0 HANDLING OF REPORTED VIOLATIONS

9.1. CS-SUNN's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The complainant will be notified of the outcome of the investigation and decision taken.



SECTION
TEN

10.0 COMMENCEMENT

10.1. This Code is effective from the date adopted as shown below or at a later date as the Steering Committee deem appropriate. It shall not have any retrospective effect.

ADOPTED THIS DAY OF 20

SIGNATURE

SIGNATURE



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