



MISSION OF HOPE INITIATIVE

MOHI | Hope Beyond Tomorrow

WHISTLEBLOWING, COMPLAINTS AND NON-RETALIATION POLICY

Policy Edition: 2025

Safe reporting. Fair response. Accountable action.

This policy takes effect on the actual date of Board approval.

DOCUMENT CONTROL AND APPROVAL

Document title	MOHI Whistleblowing, Complaints and Non-Retaliation Policy
Policy edition	2025 Version 1.0
Policy owner	MOHI Board of Directors
Primary focal person	Batamuliza Brenda
Alternate focal person	Nakaweesa Marvis
Effective date	Actual date of Board approval
Review cycle	Every three years, or earlier where legal, safeguarding, organisational or learning needs require it

Policy commitment MOHI encourages anyone who becomes aware of suspected misconduct to report it safely and in good faith. A person does not need to prove a concern before reporting it and must not be punished because a report is not substantiated.

Approval

This policy must be approved by the MOHI Board of Directors and signed with the actual date of approval. It replaces any earlier whistleblowing document used by MOHI for future reporting and case handling after approval.

Approved by	Jjuuko Fred
Title	Board Chairperson
Signature	
Actual approval date	17th March 2025

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Read together with

MOHI Safeguarding and Child Protection Policy; MOHI Safeguarding, PSEA/SEAH Addendum; MOHI Human Resources and Volunteer Management Policy; and applicable MOHI financial, governance and code-of-conduct procedures.

1. Purpose and policy commitments

Mission of Hope Initiative (MOHI) is committed to integrity, accountability, safeguarding, respectful conduct and responsible use of resources. This policy provides a trusted process for reporting suspected wrongdoing, receiving concerns fairly, protecting people who report in good faith, and taking proportionate action where concerns are substantiated.

MOHI will:

- encourage early reporting of suspected misconduct, harm, abuse, fraud, conflict of interest or misuse of resources;
- treat every report seriously, respectfully and without retaliation;
- protect confidentiality as far as possible while allowing a fair and effective response;
- make reasonable accommodations so that young people, persons with disabilities and others facing barriers can report safely;
- manage safeguarding, sexual exploitation, abuse and harassment (SEAH) concerns through survivor-centred and safeguarding-informed pathways;
- use learning from complaints and concerns to improve practice, systems and community trust.

2. Scope and application

This policy applies to all MOHI Board members, staff, volunteers, interns, consultants, facilitators, partner representatives, contractors, suppliers and visitors. It also provides a reporting route for project participants, community members, donors and other people who experience or witness conduct connected to MOHI activities, resources, staff, volunteers or partners.

The policy applies to concerns raised in person, by telephone, email, WhatsApp, written note or other accessible format. It applies during field activities, workshops, online engagement, travel, office work, procurement, financial transactions and all other contexts connected to MOHI.

3. Definitions

Term	Meaning
Whistleblowing	A good-faith report of suspected wrongdoing, misconduct, illegal activity, abuse of power, fraud, harm or serious policy breach connected to MOHI.
Complainant / reporter	A person who raises a concern, whether personally affected, a witness or someone acting on behalf of another person with appropriate consent.
Good faith	An honest belief that the information reported may be true. A report remains in good faith even where an investigation does not substantiate it.
Retaliation	Any punishment, intimidation, exclusion, threat, discrimination, loss of opportunity, harassment or other adverse treatment because a person raised or supported a concern.
Conflict of interest	A situation in which a person handling a concern has a personal, family, financial, professional or other interest that could affect impartiality.
SEAH	Sexual exploitation, abuse and harassment. Such concerns must be prioritised and handled under MOHI safeguarding procedures.

4. Concerns that may be reported

A report may relate to any suspected conduct that is unsafe, dishonest, abusive, unlawful, unethical or inconsistent with MOHI policies. Examples include, but are not limited to:

fraud, theft, bribery, corruption, falsification of records, financial mismanagement, aid diversion, procurement misconduct, money laundering or misuse of project funds or property;

nepotism, undeclared conflicts of interest, favouritism, abuse of authority or improper influence in recruitment, procurement, payment or selection decisions;

sexual exploitation, abuse, harassment, child abuse, safeguarding failures, discrimination, bullying, intimidation or harassment;

violence, threats, serious health and safety risks, misuse of digital platforms, breach of confidentiality or misuse of personal data;

misrepresentation of project information, participant data, results, attendance, expenses, organisational documents or donor reporting;

retaliation against a person who has reported a concern or participated in an inquiry;

conduct by partners, consultants, suppliers or volunteers that may place participants, communities, MOHI or grant resources at risk.

Not a substitute for emergency response

Where someone is in immediate danger, needs urgent medical help, or a serious crime may have occurred, seek emergency or protection support first and report the concern to MOHI as soon as it is safe to do so.

5. How to report a concern

Reports may be made orally or in writing. MOHI does not require a particular form, witness or proof before a person can report a concern. A person should share as much information as they safely can, including what happened, when, where, who was involved and whether anyone is at immediate risk.

Primary focal person	Batamuliza Brenda - Complaints and Whistleblowing Focal Person
Alternate focal person	Nakaweesa Marvis - Alternate Complaints and Whistleblowing Focal Person
Confidential email	advocacy@missionofhopeinitiative.org
Telephone / WhatsApp	+256 770 588 388
Board escalation route	Board Chairperson, through a confidential report addressed: "Private and Confidential - Board Chairperson"

A person may use the reporting route that feels safest. Where the concern relates to the primary focal person, the alternate focal person should be contacted. Where it relates to the alternate focal person, the primary focal person should be contacted. Where it relates to both focal persons, a Board member or the Board Chairperson, the report may be directed to any non-implicated Board Director or to an appropriate external authority, funder, regulator or law-enforcement body.

A reporter should not investigate, confront the alleged wrongdoer, gather evidence in unsafe ways or share a concern widely on social media. MOHI will assess and handle reports through the appropriate process.

6. Confidentiality, accessibility and anonymous reporting

MOHI will handle all reports on a strict need-to-know basis. Information will be shared only with people who need it to assess the concern, protect people from harm, investigate fairly, make decisions, provide support or meet lawful reporting duties. Absolute confidentiality cannot be guaranteed where disclosure is necessary to protect someone,

comply with law or ensure a fair process, but MOHI will discuss any necessary sharing with the reporter where possible and safe.

MOHI will accept anonymous reports. Anonymous reports will be assessed using the information available, although the ability to investigate or provide feedback may be limited. A report may also be submitted through a trusted support person, interpreter or accessibility assistant, provided confidentiality and the wishes of the affected person are respected.

Reasonable accommodations may include accepting oral reports, large-print or easy-read information, accessible meeting locations, extra time, sign-language interpretation, a trusted support person or alternative communication methods.

7. Good faith reporting and protection from retaliation

No person who makes a report in good faith, seeks advice, provides information, acts as a witness or supports another person to report may be threatened, punished, harassed, intimidated, excluded, discriminated against or otherwise disadvantaged because of their involvement.

Retaliation is a serious breach of this policy. Any person who believes retaliation has occurred should report it immediately through any reporting route. MOHI will consider protective steps, which may include limiting contact, changing reporting lines, restricting access to information or premises, providing support and taking disciplinary action where appropriate.

A report is not malicious merely because it is mistaken, cannot be proven or is not substantiated. Deliberate fabrication of information or knowingly false allegations may be addressed through a fair process, but only where there is clear evidence of bad faith.

8. Initial screening and immediate safety action

The receiving focal person will record the concern securely, assess whether anyone faces immediate risk, identify any conflict of interest and determine the appropriate handling route. Where a safeguarding, SEAH, child protection, serious fraud, criminal or urgent safety concern is raised, it will be prioritised and referred through the relevant MOHI procedure or statutory pathway.

MOHI will aim to acknowledge a report within five working days where contact details are available. Acknowledgement does not mean that a finding has been made. It confirms receipt, explains the next step where possible and provides information on confidentiality and protection from retaliation.

9. Investigation, decisions and referrals

Following screening, MOHI may resolve a concern through advice, corrective action, safeguarding response, management action, formal investigation, referral to an external authority, or another appropriate route. Matters will be handled proportionately, fairly, promptly and without assuming wrongdoing before facts are assessed.

An investigation may include review of records, interviews with relevant people, examination of systems, consultation with safeguarding or financial specialists, and consideration of any legal or donor-reporting requirements. The person managing the case will keep a written case record and document key decisions.

Possible outcomes may include:

- no further action where the concern is unsubstantiated or outside MOHI control;
- corrective action, restitution, process improvements, additional training or strengthened controls;
- disciplinary action or termination of a volunteer, consultant, contractor or employment relationship, following a fair process;
- referral to relevant protection, regulatory, donor, legal or law-enforcement authorities;
- support, referral or reasonable safety measures for affected persons and witnesses.

The reporter will be given appropriate feedback on progress and outcome where possible, while respecting confidentiality, privacy, safeguarding needs, legal limits and the rights of all people involved.

10. Conflicts of interest and independent handling

Any person receiving, screening, investigating or deciding a case must declare and manage any actual or perceived conflict of interest. A person who is implicated in a concern, has a close relationship with a person involved, or may not be impartial must not handle or influence the case.

Where a concern relates to a Board member, senior leader, focal person or person normally responsible for case handling, the Board will appoint a non-implicated and appropriately qualified person or panel to oversee the case. Where MOHI cannot manage the concern impartially or safely, it will seek independent support or refer the matter to an appropriate external authority.

11. Communication, records and data protection

MOHI will keep complaints and whistleblowing records in restricted files. Access will be limited to authorised people with a clear role in handling the matter. Records will include the report, risk assessment, action taken, decisions, communications, referrals and closure record. Personal information will be handled with care and retained only for as long as necessary for the case, organisational accountability, donor obligations and any applicable legal requirements.

MOHI will not publish the identity of reporters, affected people or witnesses without a valid reason. Where anonymous reporting, digital messages or WhatsApp communication are used, MOHI will take reasonable steps to protect screenshots, messages and other information from unnecessary sharing.

12. Roles and responsibilities

Role	Responsibilities
MOHI Board of Directors	Approve the policy; ensure independent handling of serious or conflicted cases; oversee systemic learning; and ensure no retaliation occurs.
Primary focal person	Receive reports; provide a safe first response; record and triage concerns; assess immediate risk; coordinate the correct pathway; and keep case information secure.
Alternate focal person	Receive reports where the primary focal person is unavailable or conflicted; provide accessible support; and ensure continuity of safe handling.
Managers and supervisors	Create a safe reporting culture; forward concerns promptly; never discourage reporting; never investigate beyond their authority; and protect confidentiality.
Staff, volunteers and associates	Report suspected wrongdoing in good faith; cooperate with fair inquiries; protect confidentiality; and refrain from retaliation or interference.
Partners, suppliers and contractors	Comply with this policy where applicable; report concerns connected to MOHI-supported work; and cooperate with proportionate investigations or referrals.

13. Training, awareness and monitoring

MOHI will communicate this policy to Board members, staff, volunteers, interns, consultants and relevant partners. Reporting contacts will be shared during induction and made available in accessible formats. Project teams will be reminded that safeguarding, financial integrity, discrimination, harassment, conflicts of interest and retaliation concerns can be reported without fear.

The Board will periodically review anonymised themes from reports, actions taken, training needs and control gaps. No report will be used to identify or shame a reporter. Learning will be used to improve prevention, accountability, safeguarding and project quality.

14. Review and implementation

This policy will be reviewed every three years or earlier where lessons from a case, changes in law, donor requirements, safeguarding practice, organisational structure or project operations make revision necessary. The Board is responsible for approving any amendment and ensuring that updated versions are communicated clearly.

Implementation note

MOHI will maintain a confidential case register, provide safeguarding and complaints induction to people involved in project delivery, and ensure that the reporting contacts named in this policy remain active and accessible.

Appendix A. Confidential report form

This form is optional. A report may be made orally, by phone, email, WhatsApp, in writing or through a trusted support person. Do not delay reporting because the form is incomplete.

Date received	
How was the report received?	In person / telephone / WhatsApp / email / written note / other
Reporter name and contact details	Leave blank if anonymous
Preferred safe contact method	
Is anyone in immediate danger?	Yes / No / Not known
Who is involved?	
What happened?	Include dates, location, people involved and any available information.
What support or protection is needed now?	
Received by	Name, role, date and signature

Confidentiality reminder

Store the completed form in the restricted case file. Do not circulate it through general email or WhatsApp groups.

Appendix B. Case-handling flow

1. Receive	Receive the concern respectfully. Do not make promises that cannot be kept. Do not ask the reporter to investigate.
2. Protect	Assess immediate safety, safeguarding, SEAH, fraud or criminal risks. Take urgent protective or referral action where needed.
3. Record	Create a restricted case record. Capture the concern, date, reporting route, any immediate action and conflict-of-interest check.
4. Triage	Decide whether the matter needs safeguarding referral, financial review, management action, formal investigation or external referral.
5. Handle fairly	Appoint a non-conflicted case handler. Use a proportionate, confidential and fair process. Protect everyone from retaliation.
6. Decide and act	Record findings and actions. Take corrective, disciplinary, safeguarding, financial or referral action as appropriate.
7. Close and learn	Share appropriate feedback, close the file securely and record learning or system improvements without exposing personal details.
Safeguarding and SEAH concerns These concerns must be prioritised and handled through MOHI safeguarding procedures. Safety, dignity, consent, confidentiality and survivor-centred support come first.	

Appendix C. Staff, volunteer and partner acknowledgement

I confirm that I have received, read and understood the MOHI Whistleblowing, Complaints and Non-Retaliation Policy. I understand that I must report concerns in good faith, protect confidentiality, cooperate with fair processes and never retaliate against a person who raises or supports a concern.

Full name	
Role / relationship to MOHI	
Telephone or email	
Signature	_____
Date	_____
Facilitator / induction lead	_____

Key reporting contacts Primary: Batamuliza Brenda Alternate: Nakaweesa Marvis advocacy@missionofhopeinitiative.org +256 770 588 388

