

# FSD MANILA ADMINISTRATIVE TASKS

## 13. WHISTLE BLOWER POLICY

1. **Contents** : Fraud, Corruption and Sexual Abuse: FSD's Whistle Blower Policy

2. **Aim** :

3. **Discussion** :

References : doc.fsd.ch, in particular:  
FSD internal and external audit policy FSD  
financial procedures  
FSD procurement procedures  
FSD Rules & Regulations

Principle and definitions :

Corruptive behaviour is defined as *the misuse by any national or international staff of entrusted power for private gain or advantage*. The unrightful private advantage gained by corruptive behavior can be both financial (e.g. a commission, a cash bribe, a kick-back etc.) or non-financial (e.g. abuse of services of a subordinate, a career advantage, sexual abuse etc.).

FSD's activities and projects are based on the following principles:

**Humanity**, meaning the focus on saving human lives and alleviating suffering wherever it is found

**Impartiality**, meaning the implementation of actions solely on the basis of need, without discrimination between or within affected populations

**Neutrality**, meaning that FSD operations must not favour any side in an armed conflict or other dispute where such action is carried out

**Independence**, meaning the autonomy of humanitarian objectives from the political, economic, military or other objectives that any actor may hold with regard to areas where humanitarian action is being implemented.

Corruptive behavior is not only morally unacceptable, but it threatens one of several of these principles and therefore the trustworthiness, reputation and image of FSD.

FSD therefore is determined to prevent corruptive behavior by the following set of rules and processes:

- Tight financial controls, comprehensive financial tracking, monitoring and reporting systems
- Application of the principle of double signatures on all accounting documents
- Systematic internal audit of all accounting entries and relevant documents
- Application of the national and international procurement procedures
- Establishment of beneficiary lists with transparent criteria
- Encouragement of donor monitoring
- Definition, declaration and application of clear employment criteria and recruitment procedures
- Generic e-mail system
- Sensitization and regular refresher training of all managers and staff
- Zero tolerance for those who commit sexual exploitation and abuse.

Corruptive behavior is considered as severe professional mistake and sanctioned accordingly in case of violation.

If despite all these principles and control mechanism, abusive and corrupt behavior of a staff or manager is noted, FSD encourages all staff to declare such observations. In order to protect the observing reporter and assure the suspected staff or manager of strict, objective and professional analysis and treatment of the allegation, the following procedure is to be followed.

**Procedure for reporting of suspected or witnessed corruptive behavior (Whistleblower Policy):**

FSD has named as ombudsman for such allegations its board member, Dr. Nawal Aït-Hocine. Allegations should be transmitted by e-mail to [transparency@fsd.ch](mailto:transparency@fsd.ch), or by letter to the following postal address:

Dr. Nawal Aït-Hocine  
38 Route de Malagnou  
1208 Geneva  
Switzerland

For urgent cases, she can also be reached by telephone under the following number: +41 79 679 4572.

Allegations should be precise and detailed, include the name and function of the alleged offender, description of circumstances, events and timing and include copies of relevant documents if available. The allegation has to be signed by the reporter. Anonymous declarations will not be dealt with.

If the claims appear to be serious and substantiated, Dr. Aït-Hocine will open a full investigation of the case, based on all available reports and documents, and by involving managers and staff at all hierarchical levels if necessary. In severe cases, Dr. Aït-Hocine will personally visit the concerned project and complete her inquiry by personal analysis and audit of the situation. Dr. Aït-Hocine will throughout the whole procedure guarantee full confidentiality about the identity of the reporter and neither reveal his/ her name during the investigation nor in the final report.

Dr. Aït-Hocine will conclude her inquiry by drafting a comprehensive report about the case and deliver it to the Director General who will then decide on how to correct the situation and sanction the offender - or close the file in case the findings have been unsubstantial.

In case proven guilty of corruptive behavior (inclusive of sexual exploitation and abuse), immediate termination of contract as well as ban on any contract or dealings with FSD.

This procedure is made available for all staff and regularly taught and reminded in all basic and refresher training courses for all international and national staff.

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