



KeNAWRUA Draft Whistle-Blowing Policy (2025).

A. Introduction.

1. The KeNAWRUA Whistle-Blowing Policy is designed to reinforce the Association's commitment to integrity, transparency, and accountability in all its operations.
2. This Policy applies to all KeNAWRUA members, staff, and implementing partners involved in KeNAWRUA-supported programs and activities.
3. It provides a secure and confidential mechanism for reporting suspected misconduct or unethical behavior, ensuring concerns are addressed seriously and fairly, without fear of retaliation for genuine disclosures.

B. Purpose and Scope.

4. This Policy aims to:
 - Encourage individuals to report suspected wrongdoing with confidence;
 - Provide clear channels for reporting and receiving feedback;
 - Protect Whistle-blowers from retaliation or unfair treatment;
 - Promote a culture of integrity, ethical conduct, and accountability among all stakeholders.
5. The Policy applies to all KeNAWRUA operations, including government, donor and individual funded partner-implemented programs.



6. All stakeholders are encouraged to report suspected or actual misconduct involving KeNAWRUA staff, members, or partners.
7. This Policy works alongside—rather than replaces—existing policies such as the Code of Conduct, Grievance, Anti-Corruption, Safeguarding, and Environmental & Social Safeguards Framework (ESSF).
8. Whistle-blowing concerns may include but are not limited to:
 - Criminal acts or legal non-compliance
 - Fraud, corruption, or financial mismanagement
 - Misuse of resources or donor funds
 - Abuse of power or position
 - Harassment (including sexual), exploitation, or discrimination
 - Environmental harm
 - Conflicts of interest and unethical procurement
 - Child and vulnerable adult abuse
 - Modern slavery, trafficking, or other serious misconduct
 - Breach of internal policies or actions that risk KeNAWRUA’s reputation



9. A “Whistle-blower” is any person who raises a genuine concern in good faith about suspected misconduct, regardless of whether the concern is ultimately upheld.
10. Whistle-blowers acting in good faith are protected from retaliation. Anyone found retaliating will be subject to disciplinary measures.

C. What Is Not Covered Under This Policy.

11. Personal employment or HR-related grievances (not involving misconduct as outlined above) should be raised through KeNAWRUA’s Grievance Procedure via Human Resources.

D. Oversight and Accountability.

12. The KeNAWRUA Board, through a designated sub-committee, holds overall responsibility for the implementation and review of this Policy.
13. The National Internal Audit Unit has operational responsibility, including staff training during reviews and audits.
14. This Policy will be reviewed every two (2) years for legal and operational relevance.

E. Reporting Channels.

15. Reports may be submitted through any of the following:
 - Immediate Supervisor or Line Manager



- HR Representative
- Chief Executive Officer (CEO)
- KeNAWRUA Board
- Designated Whistle-Blowing Email: whistleblowing@kenawrua.org

16. If the complaint involves the CEO, it should be submitted to the Chairperson.
If it involves the Chairperson, report to the Board.
If it involves the Board, report to the General Assembly.

17. Complaints of sexual exploitation, abuse, or harassment—including against children or vulnerable adults—may be reported to the Secretariat or the Board.

F. Confidentiality and Anonymity.

18. Reports can be made anonymously. However, anonymous reports may limit the ability to conduct thorough investigations.

19. All reports are handled with strict confidentiality. If identity disclosure becomes necessary for legal or investigative purposes, the Whistle-blower will be consulted and their safety prioritized.

G. Protection and Support for Whistle-Blowers.

20. Whistle-blowers raising concerns in good faith will be supported and protected from any adverse consequences.



21. Any form of retaliation—threats, intimidation, or unfair treatment—against Whistle-blowers is strictly prohibited and subject to disciplinary action.
22. False or malicious allegations will be treated as serious misconduct and subject to disciplinary action.
23. Support options such as psycho-social counseling, legal support, and medical care may be offered to Whistle-blowers.

H. Handling and Investigation of Reports.

24. Upon receiving a report:
 - An initial assessment will determine the appropriate course of action.
 - Matters may be referred to management, internal/external investigators, or regulatory authorities.
 - Immediate action will be taken if safety or legal risks exist.
25. Investigations must be impartial, thorough, and timely. Committees must be free of conflicts of interest and uphold due process.
26. Investigation updates and outcomes (where feasible) will be communicated to the Whistle-blower.
27. Within 7 working days of report receipt, the designated authority will acknowledge receipt, outline next steps, and provide timelines where possible.



I. Appeals Process.

28. Any person dissatisfied with the outcome of an investigation has the right to appeal within five (5) working days.

29. Appeals must be submitted in writing and will be reviewed by an authority uninvolved in the original investigation.

J. Awareness and Communication.

30. Department heads and HR managers are responsible for ensuring that all staff and new hires are aware of this Policy.

31. KeNAWRUA will also share this Policy with implementing partners to ensure shared accountability and transparency.

K. Review and Monitoring.

32. This Policy will be reviewed biennially by the Internal Audit team in consultation with the Board's relevant sub-committee, ensuring its ongoing relevance and effectiveness.

Appendix 1: Whistle-Blowing Process Flow.

A detailed process table should be appended here, outlining:

- Receiving the complaint
- Preliminary assessment



- Investigation (including committee composition)
- Communication of findings
- Decision-making and corrective action
- Appeal process (if triggered)
- Final resolution and close-out.



Appendices 1. KeNAWRUA Whistle-Blowing Process.

This table outlines the key stages of the KeNAWRUA Whistle-Blowing Mechanism. Each step is designed to ensure complaints are handled confidentially, fairly, and effectively.

Process Step	Description
Receiving the Complaint	Complaints can be received through various channels: direct supervisors, HR representatives, CEO, or via the official email (whistleblowing@kenawrua.org). Anonymous reports are accepted.
Preliminary Assessment	Initial review by the designated authority (e.g., CEO, HR, or Board sub-committee) to determine if the concern warrants a full investigation or if it should be handled through other channels.
Investigation	A formal investigation is launched. A committee is constituted ensuring no conflict of interest. This may include internal audit staff, legal personnel, and other independent members as needed.
Communication of Findings	Once the investigation is complete, findings are documented and communicated to relevant stakeholders including the whistle-blower (if contactable), while maintaining confidentiality.
Decision-Making and Corrective Action	The decision-making body (e.g., Management Board or designated panel) reviews the findings and determines appropriate actions including disciplinary measures or policy reforms.
Appeal Process (if triggered)	If the whistle-blower or respondent disagrees with the decision, they may file a written appeal within 5 working



	days. A separate panel uninvolved in the initial investigation handles the appeal.
Final Resolution and Close-Out	The case is officially closed. Documentation is securely archived, and final notifications are sent to involved parties. Lessons learned may inform future training or policy improvements.