WHISTLE BLOWER POLICY

SALMA ATTAH
FOUNDATION
FOR WOMEN AND GIRLS SUPPORT

Salma Attah Foundation for Women and Girls Support (SAFWGS) Whistleblowing Policy



Version 2.0 | November 2026

Whistleblowing Policy

Version 2.0 | Approved November 2026 | Next review November 2027

Purpose

SAFWGS wants anyone who sees wrongdoing in our work to feel safe speaking up, and to know that they will be listened to and protected. Early reporting lets us stop harm, protect the women, girls and communities we serve, and keep the trust of our funders and partners. This policy explains what to report, how to report it, what happens next and how we protect people who report in good faith.

Who can report

Anyone can raise a concern under this policy, including:

- Board members, staff, interns, fellows and volunteers
- Consultants, suppliers and partner organisations
- Programme participants, their parents, guardians and community members
- Members of the public

What to report

Report any concern that SAFWGS, or someone acting for SAFWGS, has done or is doing something wrong. Examples include:

- Fraud, theft, bribery, kickbacks or misuse of SAFWGS or donor funds
- Falsified receipts, attendance lists, reports or results
- Sexual exploitation, abuse or harassment, or any harm to a child or an at-risk adult
- Breaches of the Child Safeguarding, Adult Safeguarding, Data Protection or AI Use policies
- Undeclared conflicts of interest or manipulated procurement
- Discrimination, bullying or abuse of power
- Breaches of Nigerian law or of a funder's conditions
- Risks to health and safety

- Deliberately hiding any of the above

You do not need proof. A reasonable suspicion is enough. Do not investigate the matter yourself, as this can damage evidence or put you at risk.

Personal complaints about your own pay, workload or working relationships are handled under the grievance procedure in the HR Policy, unless they also involve one of the issues above.

How to report

Use whichever channel you are most comfortable with:

- **Email:** info@safwgs.org with the subject line "CONFIDENTIAL – Whistleblowing"
- **Phone or WhatsApp:** +234 813 693 1762
- **In person or in writing** to your supervisor, the Programme Manager or the Executive Director
- **The Board Chair**, if the concern involves the Executive Director or a board member. The Board Chair's contact details are given in the staff induction pack and on the office noticeboard.

Concerns about the sexual exploitation or abuse of a child or adult, or a risk to someone's safety, should be reported immediately under the Child Safeguarding or Adult Safeguarding Policy. If someone is in immediate danger, contact the police or emergency services first.

When you report, try to include what happened, when and where, who was involved, how you know, and any documents or evidence. Anonymous reports are accepted and will be looked into, but they are harder to investigate because we cannot ask follow-up questions.

What happens after you report

- **Within 3 working days:** we acknowledge your report, if you have given contact details
- **Within 10 working days:** the Executive Director, or the Board Chair where the Executive Director is involved, decides whether an investigation is needed and who will carry it out
- **Within 30 working days:** we aim to complete the investigation. If it will take longer, we will tell you
- **At the end:** we tell you that the matter has been dealt with. We may not be able to share details where this would breach someone else's privacy or a legal requirement

Investigators must be independent of the matter reported and must declare any conflict of interest. Where a concern involves donor funds, SAFWGS will inform the affected funder within the time set out in the grant agreement. Where a crime may have been committed, SAFWGS will refer the matter to the relevant authority, such as the Nigeria Police Force, EFCC, ICPC or NAPTIP.

Confidentiality

Your identity will only be shared with the people who need to know it to deal with your concern, and only with your consent, unless the law requires otherwise. Reports and investigation records are stored securely under the Data Protection Policy and kept for at least six years.

Protection from retaliation

No one will be dismissed, disciplined, denied work or services, threatened or treated unfairly because they raised a concern in good faith, even if the concern turns out to be mistaken. This protection also covers witnesses and anyone who helps with an investigation.
Retaliating against a whistleblower is serious misconduct and will lead to disciplinary action, up to dismissal or removal from the Board. If you believe you have been treated badly for speaking up, report it through any of the channels above.

False or malicious reports

A person who knowingly makes a false report to harm someone else may face disciplinary action. Honest mistakes are not misconduct.

Responsibilities

- **Board:** owns this policy, receives a summary of reports at each board meeting, and handles concerns about the Executive Director
- **Executive Director:** makes sure every report is handled under this policy and keeps the Whistleblowing Register
- **Supervisors and managers:** pass any concern they receive to the Executive Director on the same day and do not investigate it themselves
- **Everyone:** reports concerns and cooperates with investigations

Related policies

- Child Safeguarding Policy
- Adult Safeguarding Policy
- Conflict of Interest Policy
- Finance Policy
- HR Policy
- Data Protection Policy

Approval

Approved by the Board of SAFWGS in November 2026. This policy will be reviewed in November 2027, or earlier if the law, a funder requirement or SAFWGS's work changes. Approved by the Board of Trustees of SAFWGS by resolution dated 12 November 2026. Signed copies are held by SAFWGS and are available to funders and partners on request.