



MIO-ECSDE's WHISTLEBLOWING POLICY

The Mediterranean Information Office for Environment, Culture and Sustainable Development (hereby referred to as MIO-ECSDE), acknowledges that any organization might face the risk of unknowingly harboring illegal or unethical conduct and commits to maintain an open culture with honesty, integrity and accountability where staff can report in confidence any legitimate concerns without fears of retaliation.

OBJECTIVES OF THIS POLICY

- To encourage staff to report malpractice, unethical conduct and illegal practices in the workplace without fears of reprisal, detriment or discrimination.
- To provide guidance to staff as to how to report those concerns.
- To provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace.

Who does this policy apply to?

It applies to MIO-ECSDE's Executive Bureau members, managers, staff and interns who wish to report wrongdoings and grievances in the workplace.

External complaints from MIO-ECSDE's member organizations and affiliated organizations, partners and the members of the public (individual, company or other entity) can be made according to MIO-ECSDE's Complaint Policy.

What is reported under this policy?

This Policy deals exclusively with suspected wrongdoing that is in the public interest (fraud and corruption, breach of a legal or regulatory requirement or unethical and immoral behavior) and with internal grievance (discrimination, bullying, etc. at the workplace).

The concerns that are in the scope of this policy are (this list is not exhaustive):

- A criminal offence
- A miscarriage of justice
- A danger to the health and safety of any individual
- Discrimination and breach of MIO-ECSDE's Gender Policy
- Breach of MIO-ECSDE's Code of Conduct
- Breach of MIO-ECSDE's Anti-Fraud/Corruption policy
- Physical/psychological/sexual abuse
- General malpractice such as immoral, illegal and unethical conduct
- Deliberate attempt to conceal all of the above

Raising a whistleblowing concern

Whistleblowing claims should be made immediately after witnessing the act. Claims can also be made up to a three-month period after the act and in this case, the whistleblower should explain the reason of the delay in his/her disclosure.



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A whistleblower can make the disclosure on any concern within the scope of this policy immediately to his/her line manager. If the claim concerns the line manager, the whistleblower can address the Chairperson or the Quality Assurance Officer. If the claim concerns the Chairperson or the Quality Assurance Officer, or if the whistleblower wishes to remain anonymous, he/she can make the disclosure confidentially to whistleblowing@mio-ecsde.org which will be received by MIO-ECSDE's Integrity Officer Ms Thomais Vlachogianni.

It should be clear that the disclosure is made within the terms of this whistleblowing policy. This will ensure that the recipient of the disclosure realizes this and takes the necessary action to investigate the disclosure and to protect the whistleblower's identity.

When disclosing any concerns, the whistleblower would not be expected to have absolute proof of malpractice or illegal practices, but would need to show the sound reasons for his/her concerns. The disclosure should contain the following information:

- An indication that the disclosure is made under the whistleblowing policy;
- Name and position within the organization (the claim can also be submitted anonymously, however this will limit the extent to which the investigation team can provide feedback to the whistleblower);
- If the whistleblower wishes his/her identity to be declared to the investigation team, he/she should make it clear in the disclosure;
- A detailed explanation of the issue. If the complaint concerns a member of staff or the Board, it recommended to provide the name of the person in question, though it is not mandatory;
- Reason of delaying the claim (if applicable);
- Supporting documentation (if available).

At the receipt of the claim, the recipient will convey it to the office manager, the financial manager and the chairperson, without reference to the whistleblower identity (unless it is requested otherwise), who will initiate an investigation on the alleged matter or practice. If the matter concerns a member of the investigation team, he/she will not be notified to avoid conflict of interest.

The investigation team will communicate the progress of the claim, its likely timescale, any further information required from the whistleblower and the outcome of the investigation to the Integrity Officer who will, in turn, inform the whistleblower. The Integrity Officer should treat any information about the investigation as confidential.

Possible outcomes of the investigation may include:

- No further action
- Disciplinary action
- Further investigation by an external authority.

Right to appeal

If the discloser is unhappy about the outcome of the investigation, he/she should make a further report to the Integrity Officer outlining his/her concerns. If there is good reason to do so, and particularly if there is new evidence, the concern will be investigated again.



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Confidentiality:

MIO-ECSDE commits to keeping the identity of the whistleblower confidential at all stages of the process. If it is necessary for the investigating team to know the identity of the claimer, the Integrity Officer will discuss this with him/her.

Protection and support for whistleblowers

MIO-ECSDE undertakes to protect any member of staff from any personal claims and from any detriment, victimization, harassment or bullying as a result of their disclosure. Any detriment will be regarded as gross misconduct which will result in disciplinary action.

Untrue allegations

If the whistleblower makes an allegation, which is not confirmed by subsequent investigation, in good faith no action will be taken against him/her. However, appropriate disciplinary action will be taken against any employee who is found to have made a disclosure maliciously, that she/he knows to be untrue, or without reasonable grounds for believing that the information supplied was accurate.

Registering claims and disclosures

When the investigation is concluded, a confidential report should be written by the investigation team providing the following information:

- All the communications with the whistleblower and the person concerned in the disclosure;
- Documents and interview transcripts collected for investigations;
- Documentation of the outcomes of the investigations;
- Any further observations of the discloser, or appeals, after being informed of the outcomes.

All confidential reports will be registered in eQual Suite by the Quality Assurance Officer according to MIO-ECSDE's internal procedure "Management of failures-complaints."

Update

This policy was approved by the Executive Bureau of MIO-ECSDE in September 2020 and may be periodically updated. The latest version is available on [this page](#) and was published in December 2020. Any changes made are posted here and are effective immediately.