

Preventing Bribery and Corruption Policy

Policy Name	Preventing Bribery and Corruption Policy
Policy Reference	HRM-PBACP

	Print Name	Role	Signature
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1. Introduction

1.1 Purpose and Background

Human Relief Mission (HRM) is committed to operating with the highest standards of integrity, accountability, and compliance with applicable laws. Bribery and corruption present significant risks to the integrity and effectiveness of humanitarian efforts. This policy outlines HRM's commitment to preventing bribery and corruption within its operations and sets forth the organisation's framework for compliance with anti-bribery and anti-corruption laws. HRM recognises that bribery and corruption can undermine trust, waste valuable resources, and ultimately harm the communities we aim to help. As such, this policy serves as a critical component of HRM's broader commitment to ethical conduct and responsible governance.

1.2 Regulatory Context

The United Kingdom, along with many other countries, has established stringent legal frameworks to combat bribery and corruption, including the UK Bribery Act 2010. HRM is dedicated to aligning its operations with these regulations and any other relevant legislation, both domestically and internationally. This policy reflects HRM's commitment to upholding these legal standards and ensuring that all organisational activities comply with anti-bribery and anti-corruption laws.

1.3 Organisation's Commitment

HRM is fully committed to the prevention of bribery and corruption in all its forms. This commitment is rooted in our core values of transparency, integrity, and accountability. The organisation is dedicated to ensuring that all resources are used effectively and ethically, supporting our mission to alleviate suffering and promote sustainable development. By implementing this policy, HRM reinforces its dedication to ethical practices and responsible stewardship of resources.

1.4 Importance of Anti-Bribery and Anti-Corruption Measures

Bribery and corruption pose serious threats to the integrity, effectiveness, and reputation of humanitarian organisations. They can lead to the misuse of funds, undermine trust, and impair the delivery of aid and services to those in need. HRM acknowledges that proactive measures to prevent bribery and corruption are essential for maintaining trust with stakeholders, including donors, partners, beneficiaries, and the public. This policy reflects HRM's recognition of its role in contributing to global anti-corruption efforts and ensuring that resources are directed towards their intended purposes.

1.5 Integration with Organisational Values

HRM's mission to alleviate suffering and promote sustainable development is inherently linked to the values of transparency, accountability, and ethical conduct. This policy is

integrated into HRM's organisational fabric, reinforcing our commitment to responsible financial practices and ethical behaviour. By embedding anti-bribery and anti-corruption measures into our daily operations, HRM ensures that its activities are aligned with its core values and humanitarian goals.

1.6 Collaboration and Shared Responsibility

Preventing bribery and corruption is a shared responsibility that extends beyond the boundaries of our organisation. HRM is committed to collaborating with regulatory bodies, law enforcement agencies, and other stakeholders to combat bribery and corruption. This policy emphasises the importance of collective action and cooperation in creating an environment that deters corrupt practices. By working together, HRM aims to contribute to a global landscape that upholds the highest standards of integrity and ethical conduct.

2. Scope

2.1 Applicability

This Preventing Bribery and Corruption Policy applies comprehensively to all individuals and entities associated with HRM. This includes, but is not limited to, staff, volunteers, board members, partners, and donors. Any person or entity engaging in activities or representing HRM in any capacity must adhere to the provisions outlined in this policy. This policy also extends to contractors, suppliers, consultants, and any third parties acting on behalf of or in collaboration with HRM.

2.2 Geographic Reach

Recognising the global nature of bribery and corruption risks, this policy applies to HRM's activities both within the United Kingdom and internationally. HRM acknowledges that the risks and regulatory requirements related to bribery and corruption may vary across different regions and countries. Therefore, this policy ensures a consistent and unified approach to anti-bribery and anti-corruption measures across all geographical locations where HRM operates, while also complying with local laws and regulations.

2.3 Inclusivity

Adherence to the principles of this policy is an inclusive responsibility that applies to all individuals associated with HRM, regardless of their position or role within the organisation. This includes staff at all levels, volunteers, partners, and other stakeholders involved in HRM's operations. Each individual is expected to understand, uphold, and comply with the provisions of this policy, ensuring a collective commitment to preventing bribery and corruption.

2.4 Specific Activities

This policy encompasses a broad range of activities and operations within HRM, including but not limited to:

- **Donations and Fundraising:** Financial transactions related to donations, fundraising events, and contributions from individuals or entities to HRM. This includes ensuring that funds are obtained and used ethically and transparently.
- **Project Funding:** Financial transactions associated with project funding, grants, and collaborative initiatives. This includes due diligence in selecting and managing partners and projects.
- **Partnerships:** Financial dealings with partners, contractors, and entities engaged in joint ventures or collaborations with HRM. This includes ensuring that all partnerships adhere to HRM's ethical standards and anti-bribery principles.
- **Beneficiary Transactions:** Financial transactions related to providing financial assistance or support to beneficiaries. This includes ensuring that aid and resources are distributed fairly and without corrupt practices.
- **Operational Finances:** All financial transactions related to the operational and administrative functions of HRM. This includes procurement, payroll, and other internal financial activities.

2.5 Third-Party Relationships

HRM acknowledges that interactions with third parties, such as financial institutions, vendors, suppliers, and service providers, are integral to its operations. This policy extends to these relationships, emphasising the importance of due diligence, transparency, and collaboration to prevent bribery and corruption risks associated with third-party engagements. HRM will conduct thorough background checks and continuous monitoring of third-party relationships to ensure compliance with anti-bribery and anti-corruption standards.

2.6 Training and Awareness

This policy applies to all training programs and awareness initiatives conducted by HRM. All individuals associated with HRM are expected to participate in relevant training sessions and stay informed about the principles and requirements of this policy. Training programs will be designed to educate staff, volunteers, and partners about the risks of bribery and corruption and the importance of maintaining ethical conduct in all operations.

2.7 Future Operations

As HRM expands its operations or engages in new activities, this policy will automatically apply to such endeavours. The organisation commits to assessing and adapting its anti-bribery and anti-corruption measures to address emerging risks and compliance

requirements associated with new operations. This includes regularly reviewing and updating the policy to reflect changes in the legal and regulatory environment.

2.8 Regulatory Changes

In the event of changes to bribery and corruption laws and regulations in the UK or any other jurisdiction where HRM operates, this policy will be updated accordingly. HRM is committed to ensuring ongoing compliance with evolving legal requirements and will adjust its practices and procedures as necessary to maintain the highest standards of ethical conduct. By defining the scope of this policy, HRM ensures a comprehensive and inclusive approach to preventing bribery and corruption, covering all aspects of its operations and extending responsibilities to all individuals and entities associated with the organisation.

3. Policy Statement

3.1 Commitment to Compliance

HRM is unwavering in its commitment to full compliance with all applicable anti-bribery and anti-corruption laws and regulations in every jurisdiction where it operates. HRM recognises the importance of actively preventing bribery and corruption activities and is dedicated to upholding a zero-tolerance approach toward any form of financial crime. This includes adhering to the UK Bribery Act 2010 and other relevant international regulations, ensuring that our operations are free from unethical practices.

3.2 Ethical Conduct

HRM places a high premium on ethical conduct and responsible financial stewardship. This policy underscores HRM's commitment to maintaining the highest ethical standards in all its activities and transactions. By fostering a culture of integrity, HRM reinforces trust with its stakeholders, including donors, partners, beneficiaries, and the public, and contributes to the overall integrity of the humanitarian sector.

3.3 Integration with HRM's Mission

This Anti-Bribery and Anti-Corruption Policy seamlessly integrates with HRM's overarching mission of alleviating suffering and promoting sustainable development. By actively preventing bribery and corruption, HRM ensures that its resources are directed towards their intended humanitarian purposes, directly benefiting the communities it serves. The organisation recognises the vital role it plays in contributing to global efforts against financial crimes and upholding the principles of justice, fairness, and equality.

3.4 Continuous Improvement

HRM is dedicated to the continuous improvement of its anti-bribery and anti-corruption practices. The organisation commits to regular reviews and updates of its measures to address emerging risks, enhance effectiveness, and align with evolving legal and

regulatory requirements. HRM views the prevention of bribery and corruption as an ongoing process that requires adaptability and a proactive approach. This commitment to continuous improvement ensures that HRM remains vigilant and responsive to new challenges and opportunities.

3.5 Collaboration and Shared Responsibility

HRM recognises that the fight against bribery and corruption is a shared responsibility that extends beyond organisational boundaries. The organisation is committed to collaborating with regulatory bodies, law enforcement agencies, and the wider humanitarian sector to collectively combat financial crimes. By fostering cooperation and sharing best practices, HRM aims to contribute to a global environment that actively prevents and deters corrupt practices, ensuring that humanitarian aid reaches those who need it most.

3.6 Stakeholder Trust

HRM acknowledges that the trust of its stakeholders, including donors, partners, beneficiaries, and the public, is paramount. By adhering to robust anti-bribery and anti-corruption practices, HRM ensures that its operations are transparent, accountable, and aligned with the values of integrity and responsibility. This commitment to ethical conduct helps to build and maintain the confidence of all stakeholders in HRM's ability to deliver effective and honest humanitarian assistance.

3.7 Legal and Regulatory Adherence

HRM is dedicated to strict adherence to all relevant anti-bribery and anti-corruption laws and regulations. This includes the UK Bribery Act 2010 and other applicable legislation in the countries where HRM operates. The organisation commits to staying informed about changes in relevant laws and regulations and updating its measures promptly to ensure ongoing compliance. By maintaining up-to-date knowledge of legal requirements, HRM ensures that its practices are consistently aligned with the highest standards of legal and ethical conduct.

3.8 Reporting and Investigation

HRM encourages a culture of reporting and investigation within the organisation. Any staff member or stakeholder who suspects or identifies potentially suspicious activities is encouraged to report such concerns promptly through the established reporting mechanisms. HRM commits to thoroughly investigating reported concerns and taking appropriate actions, including reporting to relevant authorities when required by law. By fostering a transparent and accountable reporting environment, HRM ensures that any instances of bribery or corruption are promptly addressed and rectified.

3.9 Non-Retaliation

HRM guarantees protection against retaliation for individuals who, in good faith, report concerns related to potential bribery or corruption activities. Non-retaliation is integral to HRM's commitment to fostering an environment where individuals feel secure in reporting suspicions without fear of reprisal. This policy ensures that all reports are treated confidentially and that those who come forward are protected, promoting a culture of openness and accountability within the organisation.

4. Risk Assessment

4.1 Purpose of Risk Assessment

The primary purpose of HRM's risk assessment is to systematically identify and evaluate vulnerabilities within the organisation that could expose it to bribery and corruption risks. This assessment provides a comprehensive understanding of the potential threats associated with HRM's operations, partnerships, and geographic locations. By recognising these risks, HRM can effectively allocate resources, implement targeted anti-bribery and anti-corruption measures, and ensure that preventive controls are in place. The insights gained from the risk assessment process are crucial for making informed decisions about how to manage and mitigate identified risks. This process helps HRM to prioritise its efforts, enhance its internal controls, and safeguard the organisation's integrity and effectiveness in delivering humanitarian aid.

4.2 Risk Assessment Process

HRM is committed to conducting regular and thorough risk assessments to stay ahead of emerging threats. The risk assessment process involves the following steps:

- **Identification of Risks:** HRM will identify potential risks related to bribery and corruption within its operations. This includes assessing the nature of activities, partnerships, and geographic locations. Key areas of focus may include high-value transactions, interactions with government officials, and areas with a history of corruption.
- **Evaluation of Risks:** Once identified, risks are evaluated based on their likelihood of occurrence and potential impact on the organisation. This involves assessing the severity of each risk and its potential to affect HRM's operations, reputation, and compliance with legal and regulatory requirements.
- **Risk Prioritisation:** Risks are prioritised based on their evaluation to determine which risks require immediate attention and which can be monitored over time. This prioritisation helps HRM allocate resources effectively and implement appropriate controls.
- **Development of Mitigation Strategies:** For each identified and prioritised risk, HRM will develop and implement targeted mitigation strategies. These strategies may include enhanced due diligence procedures, improved internal controls, and specific training programs.

- **Continuous Monitoring:** The risk landscape is continuously monitored to detect any changes or new risks that may arise. HRM will regularly review and update its risk assessment to ensure that it remains relevant and effective in addressing current and emerging threats.

4.3 Risk Mitigation Strategies

Based on the findings of the risk assessment, HRM will develop and implement risk mitigation strategies to address identified vulnerabilities. These strategies are designed to reduce the likelihood of bribery and corruption and enhance the organisation's overall resilience. Key components of risk mitigation include:

- **Enhanced Due Diligence:** Implementing rigorous due diligence procedures for selecting and managing partners, contractors, and other third parties. This includes background checks, financial audits, and ongoing monitoring to ensure that all parties adhere to HRM's anti-bribery and anti-corruption standards.
- **Strengthened Internal Controls:** Developing and enforcing robust internal controls to prevent and detect bribery and corruption. This includes implementing clear procedures for financial transactions, approvals, and reporting, as well as establishing oversight mechanisms to ensure compliance with anti-bribery policies.
- **Targeted Training Programs:** Providing regular training to staff, volunteers, and partners on anti-bribery and anti-corruption practices. Training programs will be tailored to address specific risks identified in the risk assessment and will include practical guidance on recognising and reporting suspicious activities.
- **Clear Reporting Mechanisms:** Establishing and promoting clear reporting mechanisms for individuals to report concerns about potential bribery or corruption. This includes ensuring that reporting channels are accessible, confidential, and responsive to reported issues.
- **Regular Reviews:** Conducting regular reviews of anti-bribery and anti-corruption measures to assess their effectiveness and identify areas for improvement. This includes periodic evaluations of risk management practices and adjustments based on audit findings.
- **Adaptation to Emerging Risks:** Continuously adapting risk management strategies to address new and evolving risks. HRM will stay informed about trends and developments in the anti-bribery and anti-corruption landscape and adjust its practices accordingly.

5. Due Diligence

Due diligence is a fundamental aspect of HRM's strategy to prevent bribery and corruption. It involves a systematic process of investigating and assessing the background, practices, and risks associated with individuals and entities with whom HRM conducts business. This process

ensures that HRM engages only with parties that adhere to high standards of integrity and compliance.

5.1 Objectives of Due Diligence

The primary objectives of due diligence are to:

- **Identify Risks:** Detect potential bribery and corruption risks associated with partners, contractors, suppliers, and other stakeholders.
- **Verify Integrity:** Confirm that individuals and entities have a history of ethical conduct and are compliant with anti-bribery and anti-corruption laws.
- **Prevent Corruption:** Mitigate the risk of HRM being involved in corrupt practices by ensuring that all third parties adhere to ethical standards.
- **Maintain Compliance:** Ensure that HRM complies with legal and regulatory requirements related to anti-bribery and anti-corruption.

5.2 Due Diligence Procedures

5.2.1 Initial Screening

- **Basic Checks:** Conduct preliminary screening of individuals and entities to gather essential information, such as their identity, business activities, and reputation. This includes checking public records, online databases, and news sources for any red flags or concerns.
- **Risk Categorisation:** Classify third parties into risk categories (e.g., low, medium, high) based on initial screening results. Higher-risk categories will require more in-depth due diligence.

5.2.2 Detailed Investigation

- **Background Checks:** Perform comprehensive background checks on high-risk individuals and entities. This includes examining their history, business practices, financial stability, and any past involvement in corrupt activities. Utilise external resources, such as credit reports and legal databases, as necessary.
- **Verification of Information:** Cross-verify the information provided by prospective partners, contractors, and suppliers with independent sources. This includes validating business credentials, financial statements, and regulatory compliance.

5.2.3 Review of Policies and Procedures

- **Anti-Bribery Policies:** Assess the anti-bribery and anti-corruption policies of third parties. Verify that these policies are robust, effective, and aligned with HRM's own standards.

- **Compliance Procedures:** Review the compliance procedures and internal controls of third parties to ensure they are designed to prevent and detect bribery and corruption.

5.2.4 Contractual Safeguards

- **Contract Clauses:** Include specific anti-bribery and anti-corruption clauses in all contracts and agreements with third parties. These clauses should clearly outline expectations for ethical conduct, compliance with laws, and the consequences of non-compliance.
- **Audit Rights:** Ensure contracts grant HRM the right to conduct audits and inspections to verify compliance with anti-bribery and anti-corruption requirements.

5.2.5 Enhanced Due Diligence

- **In-Depth Analysis:** For higher-risk entities, undertake more thorough investigations. This may involve engaging external experts or consultants to conduct detailed analyses of the third party's background and operations.
- **Additional Documentation:** Request and review additional documentation, such as detailed financial records, compliance reports, and evidence of anti-corruption measures.
- **Increased Monitoring:** Implement increased oversight and monitoring for high-risk relationships. This may include more frequent reviews and audits.

5.2.6 Ongoing Monitoring and Review

- **Regular Updates:** Continuously monitor and review the status of third parties to ensure they remain compliant with anti-bribery and anti-corruption standards. This includes updating due diligence information as needed.
- **Periodic Reassessments:** Conduct periodic reassessments of existing relationships to identify any changes in risk levels and address any emerging concerns.

5.2.7 Conflict of Interest Checks

- **Disclosure Requirements:** Ensure that individuals and entities disclose any potential conflicts of interest that could affect their impartiality or create opportunities for bribery and corruption.
- **Management of Conflicts:** Implement procedures for managing and addressing conflicts of interest to prevent any undue influence or corrupt practices.

5.3 Training

- **Staff Training:** Provide training for staff involved in the due diligence process. This training should cover the principles of anti-bribery and anti-corruption, the procedures for conducting due diligence, and how to identify and address potential risks.

6. Conflicts of Interest

Conflicts of interest can undermine the integrity of HRM's operations and compromise its commitment to ethical conduct. A conflict of interest arises when an individual's personal interests or relationships interfere with their ability to act impartially and in the best interests of HRM. This section outlines HRM's approach to identifying, managing, and mitigating conflicts of interest to ensure that all decisions and actions are made with transparency and fairness.

6.1 Definition and Scope

A conflict of interest occurs when personal interests, relationships, or affiliations of HRM staff, volunteers, board members, or any other stakeholders compromise their ability to make objective and unbiased decisions. Conflicts of interest can arise in various contexts, including:

- **Financial Interests:** Situations where an individual has a financial stake in an entity that does business with HRM or stands to gain financially from HRM's decisions.
- **Personal Relationships:** Situations where personal relationships, such as family or close friendships, may influence or appear to influence professional decisions and actions.
- **Secondary Employment:** Situations where an individual's outside employment or business activities may create a conflict with their duties and responsibilities at HRM.
- **Gifts and Hospitality:** Situations where the acceptance of gifts, hospitality, or other benefits from individuals or entities doing business with HRM may create a perception of undue influence.

6.2 Identification of Conflicts

HRM employs several mechanisms to identify potential conflicts of interest:

- **Disclosure Requirements:** All staff, volunteers, board members, and other stakeholders are required to disclose any personal, financial, or professional interests that may constitute a conflict of interest. This includes any relationships or affiliations that could influence their ability to act impartially on behalf of HRM.
- **Conflict of Interest Declarations:** Regular declarations and updates are required to ensure that any changes in personal circumstances that could lead to a conflict of interest are promptly reported.

- **Self-Assessment:** Individuals are encouraged to assess their own circumstances and identify any situations that may present a potential conflict of interest.

6.3 Management and Mitigation

Once a conflict of interest is identified, HRM takes the following steps to manage and mitigate the situation:

- **Conflict Resolution Plan:** Develop and implement a conflict resolution plan that outlines how the conflict will be managed. This plan may include steps to eliminate or reduce the conflict, such as recusal from decision-making processes or the removal of personal interests.
- **Recusal from Decisions:** Individuals with a conflict of interest are required to recuse themselves from participating in any decisions, discussions, or actions that could be influenced by the conflict. This ensures that decisions are made impartially and without undue influence.
- **Monitoring and Oversight:** Implement monitoring mechanisms to ensure that conflicts of interest are managed appropriately and that affected individuals adhere to the conflict resolution plan. Regular oversight helps to ensure ongoing compliance and transparency.
- **Alternative Arrangements:** In cases where conflicts of interest cannot be fully resolved, alternative arrangements may be made to address the conflict. This could include reassigning responsibilities or seeking external advice to ensure impartial decision-making.

6.4 Reporting and Accountability

- **Reporting Mechanisms:** Establish clear reporting mechanisms for individuals to report potential or actual conflicts of interest. This includes providing confidential channels for reporting and ensuring that reports are handled with sensitivity and confidentiality.
- **Investigation and Resolution:** Investigate reported conflicts of interest promptly and thoroughly. The investigation process will involve assessing the nature and extent of the conflict, determining its impact on HRM, and implementing appropriate actions to address the situation.
- **Record-Keeping:** Maintain detailed records of reported conflicts of interest, the resolution process, and any actions taken. This documentation provides an audit trail and supports transparency and accountability.

6.5 Prevention and Training

- **Conflict of Interest Policy:** Develop and implement a comprehensive conflict of interest policy that outlines HRM's expectations, procedures, and requirements

for managing conflicts. Ensure that all stakeholders are familiar with the policy and understand their obligations.

- **Training Programs:** Provide regular training to staff, volunteers, and board members on identifying, managing, and reporting conflicts of interest. Training should include practical examples and guidance on how to navigate potential conflicts.
- **Awareness Campaigns:** Conduct awareness campaigns to reinforce the importance of avoiding conflicts of interest and maintaining integrity in all business dealings.

6.6 Review and Updates

- **Regular Reviews:** Conduct regular reviews of HRM's conflict of interest management practices to ensure their effectiveness and relevance. This includes evaluating the effectiveness of the conflict resolution plan and making adjustments as needed.
- **Policy Updates:** Update the conflict of interest policy as necessary to reflect changes in regulations, best practices, and organisational needs. Ensure that any updates are communicated to all relevant stakeholders.

7. Reporting and Whistleblowing

Reporting and whistleblowing are crucial elements in preventing and addressing bribery and corruption within HRM. These processes enable individuals to raise concerns about unethical or illegal activities in a safe and confidential manner. HRM is committed to fostering an environment where concerns can be reported without fear of retaliation, ensuring that all reports are investigated thoroughly and addressed appropriately.

7.1 Purpose of Reporting and Whistleblowing

The purpose of reporting and whistleblowing mechanisms is to:

- **Encourage Reporting:** Provide a safe and confidential way for staff, volunteers, board members, and other stakeholders to report suspicions or knowledge of bribery, corruption, or other unethical conduct.
- **Protect Integrity:** Ensure that HRM maintains the highest standards of integrity and compliance by identifying and addressing potential issues promptly.
- **Prevent Retaliation:** Safeguard individuals who report concerns from retaliation, ensuring that they feel secure in raising issues.
- **Ensure Accountability:** Promote accountability by addressing reported concerns in a transparent and effective manner.

7.2 Reporting Mechanisms

HRM provides multiple channels for reporting concerns to accommodate different preferences and situations. These mechanisms include:

- **Internal Reporting Channels:**
 - **Designated Contact Persons:** Establish specific individuals or teams (e.g., Compliance Officer, Ethics Committee) responsible for receiving and handling reports of bribery, corruption, and other unethical conduct.
 - **Reporting Forms:** Provide standardised forms or templates for reporting concerns, which can be submitted via email, postal mail, or through an internal online system.
 - **Hotline:** Implement a confidential hotline (telephone or online) that allows individuals to report concerns anonymously if preferred.
- **External Reporting Channels:**
 - **Regulatory Bodies:** Provide information on how to report concerns to relevant regulatory or law enforcement authorities, if applicable.
 - **Independent Whistleblowing Services:** Offer access to external, independent whistleblowing services for individuals who prefer an external reporting option.

7.3 Confidentiality and Anonymity

- **Confidential Reporting:** Ensure that all reports are handled with the highest level of confidentiality. Only those involved in the investigation and resolution process will have access to the details of the report.
- **Anonymous Reporting:** Allow individuals to report concerns anonymously if they choose. While anonymous reports may limit the ability to follow up for additional information, HRM will still consider and investigate them to the extent possible.

7.4 Protection from Retaliation

- **Anti-Retaliation Policy:** Implement a strict anti-retaliation policy to protect individuals who report concerns in good faith from any form of retaliation, such as dismissal, demotion, or harassment.
- **Monitoring and Enforcement:** Monitor and enforce the anti-retaliation policy to ensure that it is effective and that any instances of retaliation are addressed promptly.
- **Support Services:** Provide support services, such as counselling or legal assistance, for individuals who may experience retaliation or feel vulnerable after reporting concerns.

7.5 Investigation Process

- **Initial Review:** Conduct an initial review of reported concerns to determine the nature and seriousness of the issue. This may involve preliminary fact-finding to assess whether the concern warrants a full investigation.
- **Investigation Procedure:** Implement a structured investigation procedure to examine the reported concerns. This includes gathering evidence, interviewing relevant individuals, and assessing the findings in relation to HRM's policies and procedures.
- **Resolution:** Based on the findings of the investigation, take appropriate corrective actions, which may include disciplinary measures, changes in procedures, or reporting the findings to relevant authorities if required by law.
- **Documentation:** Maintain detailed records of the investigation process, findings, and actions taken. This documentation provides an audit trail and supports transparency and accountability.

7.6 Reporting Outcomes

- **Communication:** Communicate the outcomes of investigations to the individuals who reported concerns, where appropriate. Provide feedback on the actions taken and any measures implemented to address the reported issues.
- **Follow-Up:** Implement follow-up procedures to monitor the effectiveness of actions taken and ensure that any issues identified are fully addressed.

7.7 Training and Awareness

- **Training Programs:** Provide regular training to staff, volunteers, and board members on the reporting and whistleblowing procedures. Training should cover how to report concerns, the protections available, and the importance of reporting unethical conduct.
- **Awareness Campaigns:** Conduct awareness campaigns to keep reporting and whistleblowing procedures at the forefront of organisational practices. Use various communication channels to ensure that all stakeholders are informed about how to report concerns and the protections in place.

7.8 Review and Improvement

- **Regular Review:** Regularly review and assess the effectiveness of the reporting and whistleblowing mechanisms. This includes evaluating the ease of access to reporting channels, the responsiveness of the investigation process, and the protection measures in place.
- **Policy Updates:** Update reporting and whistleblowing policies and procedures as needed to reflect changes in regulations, best practices, and organisational needs. Ensure that any updates are communicated to all relevant stakeholders.