



## Raising Concerns and Whistleblowing Policy

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## 1. Raising Concerns and Whistleblowing Policy Statement

TurningPoint Foundation is a national non-governmental organisation (NGO) in Bangladesh working in two key areas: **Capacity Building** and **Advocacy** to promote the human rights of marginalised groups, including persons with disabilities, ethnic minorities, and other disadvantaged communities. Inclusion is a core principle embedded across all programmes and activities.

TurningPoint envisions an inclusive society where everyone, regardless of age, gender, disability, ethnicity, or other identities, has equal rights, opportunities, and participation to reach their full potential and contribute meaningfully to humanity and the environment.

We maintain a **zero-tolerance approach** to fraud, corruption, bribery, terrorist financing, child abuse, sexual exploitation and harassment (SEAH), bullying, modern slavery, and any form of human rights violation. TurningPoint is committed to fostering a culture where staff, partners, and stakeholders feel safe and empowered to raise genuine concerns about unethical, illegal, or harmful conduct.

We operate with honesty, transparency, and integrity, and expect all employees, partners, consultants, and grantees to uphold the same high standards in accordance with our organisational policies and procedures. Where reasonably practicable, we will comply with both **Bangladesh law** and **international standards** relevant to whistleblowing, human rights, and ethical conduct.

Every employee, consultant, representative, partner, or grantee has a duty to speak up about any **genuine concern** regarding wrongdoing. Additionally, any third party has the right to raise concerns (whistleblow) about a TurningPoint representative, partner, or grantee.

Staff who report concerns will be protected from retaliation under applicable whistleblowing protections, provided they do so in good faith with an honest and reasonable belief that wrongdoing has occurred, is occurring, or is likely to occur. All concerns will be treated seriously and fairly. However, **knowingly false or malicious allegations** may result in disciplinary action.

## 2. Purpose

The purpose of this policy is to ensure that all individuals associated with TurningPoint, including staff, consultants, partners, grantees, and other stakeholders, can raise concerns about suspected wrongdoing without fear of victimisation, discrimination, disadvantage, or dismissal.

This policy is designed to:

- Promote a culture of openness, integrity, and accountability
- Provide a safe and confidential mechanism for reporting concerns
- Assure individuals that disclosures made in good faith will be taken seriously and addressed appropriately

## 3. TurningPoint's Commitment



TurningPoint is committed to creating an open and supportive environment where individuals feel confident and protected when raising concerns in good faith. Our approach is guided by our core values of integrity, accountability, inclusion, and transparency.

- Communicating a clear and consistent message from leadership that reporting concerns is a shared responsibility and a protected right
- Ensuring that all staff, partners, and stakeholders understand how and when to raise a concern
- Promoting a culture in which everyone feels safe and encouraged to speak up
- Listening respectfully to anyone who raises a concern and responding appropriately
- Ensuring concerns are promptly directed to the appropriate person or team for review or investigation
- Handling all concerns professionally, responsibly, and in line with due process
- Providing protection for individuals raising concerns, as outlined in this policy
- Supporting all parties involved, including those under investigation, with fairness and confidentiality
- Training designated officers to manage concerns with sensitivity and competence
- Establishing a clear escalation process to ensure that unresolved or serious concerns are addressed at the appropriate organisational level

This policy reflects TurningPoint's organisational values and supports compliance with our **Code of Conduct, Health and Safety, Safeguarding, Equality, Data Protection**, and other relevant policies.

TurningPoint will review this policy annually to incorporate legal or regulatory developments and to reflect emerging good practices.

## 4. Scope

This policy applies to all individuals associated with TurningPoint, both current and former, including:

- Employees and officers
- Interns and volunteers
- Consultants and contractors
- Casual or agency workers
- Grantees, partners, and suppliers

The policy also applies to any context where TurningPoint, or its representatives and partners, operate—whether in direct implementation, partnership arrangements, or subcontracted work.



This policy is **mandatory** and must be applied consistently across all programmes, departments, and geographic areas where TurningPoint is active. It is designed to provide a safe and structured mechanism for raising concerns, regardless of an individual's employment status or location.

## 5. Principles

TurningPoint is committed to upholding the highest standards of integrity, accountability, and ethical conduct in all aspects of its work. We believe that all individuals associated with the organisation share this commitment. If someone suspects wrongdoing or has a concern, they have a responsibility to speak up—rather than assume someone else will act.

In turn, TurningPoint has a responsibility to:

- Provide safe, secure, and accessible channels for raising concerns
- Respond to concerns promptly and fairly
- Take corrective action where necessary to prevent harm or wrongdoing

### ▪ **Why Speaking Up Matters**

Effective mechanisms for raising concerns contribute to:

- Greater staff engagement and improved programme delivery
- More informed decision-making and learning
- Early detection and prevention of wrongdoing
- Risk control and resource protection
- Protection of lives, livelihoods, assets, reputation, and the environment
- Reduced risk of legal, reputational, or financial harm
- Enhanced trust with donors, communities, and other stakeholders

### ▪ **Creating a Culture of Openness**

Individuals often speak up out of a sense of duty or a desire to do the right thing—but we recognise this is not always easy. Leaders and managers at all levels must therefore:

- Welcome open dialogue
- Encourage staff to raise concerns without fear
- Foster a culture where individuals feel heard, respected, and supported
- Acknowledge concerns even when no change in action or decision follows

### ▪ **Protection from Retaliation**

TurningPoint guarantees appropriate support to anyone who raises a concern under this policy. No one will face discrimination, disadvantage, or retaliation in their role,



career progression, or personal safety as a result of raising a concern in good faith. Any victimisation will be treated as a serious disciplinary matter.

Concerns are always assumed to be raised in good faith. However, deliberate misuse of this policy—such as knowingly raising false or malicious allegations—may result in disciplinary action.

#### ▪ **Unauthorised Disclosures**

Raising a concern through unofficial channels—such as media, campaign groups, social media, or political parties (with the exception of your local Member of Parliament, where applicable)—may constitute **unauthorised disclosure**. In such cases, TurningPoint reserves the right to take appropriate disciplinary action, including for gross misconduct.

## 6. Definitions

**Whistleblowing** refers to the act of raising a concern, in good faith, about suspected wrongdoing, unethical behaviour, or risks to people, resources, or the organisation. These disclosures may relate to incidents observed directly at work or reported by others, and may involve internal or external actors.

Whistleblowing concerns may include, but are not limited to:

- Criminal activity
- Safeguarding violations (e.g. abuse, exploitation, or neglect)
- Financial fraud, mismanagement, or misuse of funds
- Bribery or corruption
- Human trafficking or modern slavery
- Breaches of legal, regulatory, or professional obligations
- Unauthorised disclosure of confidential or sensitive information
- Health and safety risks or negligence
- Environmental harm or misconduct
- Miscarriages of justice
- Breaches of TurningPoint's internal policies and procedures
- Deliberate concealment of any of the above

This policy applies equally to staff and to third-party individuals—such as partners, consultants, suppliers, or community members—who raise genuine concerns involving TurningPoint or its representatives.

TurningPoint ensures that **whistleblowers who are not employed by the organisation** are also protected from any form of retaliation, disadvantage, or discrimination resulting from their disclosure, provided their concerns are raised in good faith.

## 7. Safeguards

TurningPoint recognises that raising a concern can be a difficult and intimidating experience. This policy is designed to provide a safe, confidential, and supportive mechanism for doing so. Individuals who report concerns in good faith are entitled to protection from any form of retaliation, discrimination, or disadvantage.

TurningPoint commits to the following safeguards:

- All concerns will be taken seriously and investigated promptly and fairly.
- No individual will be penalised for raising a concern in good faith, even if it is not upheld.
- The organisation will never attempt to conceal evidence of misconduct or poor practice.
- Any employee found to have destroyed or withheld evidence of wrongdoing may face disciplinary action.
- Confidentiality clauses in employment or consultancy agreements will not override an individual's right to whistleblow.
- Whistleblowers' identities will be kept confidential to the fullest extent possible. Information will only be shared on a need-to-know basis for the purpose of investigation and resolution.

Investigations will be led by the **Executive Director**, with support from the **Fiduciary Risk Manager** and the **Head of Programmes**, or other appropriate personnel, depending on the nature and sensitivity of the concern.

## 8. Protection

This policy is intended to protect individuals who raise concerns in good faith and in the reasonable belief that their disclosure highlights malpractice, misconduct, or risk to people or the organisation. Whistleblowers are protected when they raise concerns through the appropriate channels, as outlined in this policy.

Key protections include:

- Freedom from dismissal, disciplinary action, or disadvantage as a result of raising a concern
- Protection from retaliation, including threats, harassment, or negative treatment in the workplace
- Commitment to confidentiality to the fullest extent possible during investigation and follow-up
- Access to appropriate support or adjustments based on the whistleblower's needs and circumstances

It is important to note that these protections apply when concerns are raised in **good faith** and in line with the process described in this policy. Individuals who deliberately bypass the appropriate channels, or who raise concerns with malicious intent or without foundation, may not be entitled to protection under this policy. In such cases, **disciplinary action** may be taken, and in extreme circumstances, legal consequences may arise.



TurningPoint encourages openness and honesty and assumes all disclosures are made with genuine concern for the organisation and its stakeholders.

## 9. Confidentiality

TurningPoint treats all whistleblowing disclosures with the utmost confidentiality and sensitivity. The organisation is committed to protecting the identity of individuals who raise concerns, and will not disclose their identity without their consent—unless disclosure is legally required or essential to a fair and thorough investigation.

In most cases, the whistleblower's identity will remain protected. However, depending on the nature of the concern and the evidence needed, it may become necessary to:

- Share the identity with designated investigating officers
- Request a formal written statement from the whistleblower
- Disclose the identity during legal or disciplinary proceedings, if unavoidable and with appropriate safeguards in place

Where this is necessary, TurningPoint will ensure that the individual is informed in advance and supported throughout the process.

Confidentiality is central to the integrity of this policy. Any breach of confidentiality by those managing the investigation may be treated as a disciplinary matter.

## 10. Anonymous Allegations

TurningPoint encourages individuals to include their name when raising concerns, as this allows for more effective follow-up, clarification, and support. However, the organisation also recognises that in some situations, individuals may prefer to report concerns anonymously.

Anonymous disclosures will be considered and may be investigated at the discretion of TurningPoint. In deciding whether to pursue an anonymous concern, the following factors will be taken into account:

- The seriousness of the concern raised
- The credibility and specificity of the information provided
- The likelihood of substantiating the concern through independent evidence or other sources

Where possible, TurningPoint will still make efforts to investigate concerns raised anonymously, and will document the outcome as part of internal risk monitoring.

If a concern is raised confidentially but not anonymously, all reasonable steps will be taken to protect the whistleblower's identity. If there is a need to disclose their identity (for example, during legal proceedings), the individual will be informed in advance and appropriate support will be provided to minimise any potential detriment.

## 11. Untrue Allegations

TurningPoint recognises that not all concerns raised will be substantiated following investigation. If a disclosure is made **in good faith** and based on an honest belief—



even if it is later found to be unfounded—no action will be taken against the individual who raised the concern.

However, individuals are expected to take reasonable care in ensuring the accuracy of the information they disclose.

Where a concern is raised **maliciously, knowingly false**, or **vexatious** in nature—and especially if such behaviour is repeated—TurningPoint may take appropriate disciplinary action in line with its internal procedures.

This provision is not intended to deter genuine whistleblowing, but to protect the organisation and its staff from deliberate misuse of the policy.

## 12. Raising a concern/Whistleblowing

### ▪ When to Raise a Concern


You should raise a concern if you witness or suspect any wrongdoing, misconduct, or risk during the course of your work with TurningPoint. Concerns should be raised as early as possible—proof is **not** required. A **reasonable and honest belief** that something is wrong or may go wrong is enough to trigger a report.

Examples of wrongdoing include fraud, safeguarding violations, financial misconduct, abuse of power, or breaches of policy or law.

### ▪ How to Raise a Concern

All concerns should be reported through TurningPoint's confidential reporting system:

 **Email:** [RaiseConcerns@turningpointbd.org](mailto:RaiseConcerns@turningpointbd.org)

 **Phone:** +88-01886100906

The **RaiseConcerns mailbox** is monitored by trained and authorised personnel who will treat your report with the strictest confidentiality. If you are unsure whether an issue qualifies, it is better to report it than stay silent. The team can advise whether your concern falls under this policy.

### ▪ What to Include in Your Report

When raising a concern, please try to include as much relevant information as possible:

- A clear description of the issue or incident
- The background and reasons for your concern
- Any relevant dates, locations, or people involved
- Whether you have raised the concern before and what response (if any) you received
- Any supporting documents or evidence (if available)
- Any potential conflict of interest (e.g. personal involvement or relationships)



You do **not** need to investigate the concern yourself. Avoid approaching individuals involved or collecting evidence independently—this is the responsibility of the designated investigation team.

It is helpful—but not mandatory—to put your concern in writing. This helps ensure accuracy and that no important details are missed.

## 13. The investigative process

TurningPoint is committed to handling all whistleblowing concerns with fairness, impartiality, and professionalism. The following steps outline how reports will be investigated:

### 1. Appointment of Investigating Officer

The **Executive Director (ED)** will appoint an appropriate **Investigating Officer** based on the nature of the case and ensuring there is **no conflict of interest**.

If the concern involves a senior manager or the ED, a **Board member** or a suitably senior and impartial individual will be appointed to lead the investigation.

### 2. Handling the Initial Disclosure

If a concern is raised **orally**, the receiving line manager must document it thoroughly and forward it to the Investigating Officer.

Anonymous disclosures should also be passed to the Investigating Officer for review.

### 3. Fact-Finding and Interview Process

The Investigating Officer will establish and document the **basis of the concern** and gather relevant facts.

If needed, a **fact-finding meeting** will be held with the person who raised the concern. They may be accompanied by a colleague for support; however, the companion must observe confidentiality and may not answer questions on the complainant's behalf.

The investigation will focus on determining:

- Whether malpractice or misconduct has occurred
- Whether the matter falls within this policy or should be referred elsewhere (e.g. HR, safeguarding)

If criminal activity is suspected, the Investigating Officer will **refer the case to the police**, ensuring that internal inquiries do not interfere with any external investigation.

### 4. Reporting and Decision-Making

The Investigating Officer will prepare a **written report** summarising the findings, conclusions, and any recommendations.

This report will be submitted to the **ED**, who will determine the appropriate course of action.



If the concern is substantiated, **disciplinary proceedings** may be initiated against the subject of the complaint, in line with TurningPoint's HR policies.

To maintain confidentiality, details of disciplinary actions may not be shared with the complainant.

## 5. Communication with the Complainant

The Investigating Officer will:

- Acknowledge the concern in writing as soon as reasonably possible
- Keep the complainant informed about the progress of the investigation
- Provide written feedback on the outcome and any actions taken, subject to confidentiality constraints

If the investigation is lengthy, the Investigating Officer will send periodic written updates.

If the complainant believes the concern has not been properly addressed, they may escalate the matter in confidence to the **Executive Director**.

## 6. Further Rights

If all internal procedures have been exhausted and the complainant remains dissatisfied, TurningPoint respects the **legal right of employees or former employees** to make a disclosure to a prescribed external authority, provided it is done lawfully and in good faith.

## 14. Responsibilities

All individuals associated with TurningPoint share a responsibility to uphold this Whistleblowing Policy and contribute to a culture of transparency, integrity, and accountability.

### ▪ Organisational Leadership

- **Directors, senior managers, and line managers** are responsible for ensuring that the policy is communicated, understood, and applied within their teams. They must take appropriate and timely action when concerns are raised and ensure there is no retaliation against whistleblowers.
- The **Executive Director, Fiduciary Risk Manager, and Head of Programmes** are responsible for promoting awareness of this policy, monitoring its implementation, and determining when a breach has occurred. They also ensure that investigations are carried out in accordance with this policy.

### ▪ All Staff and Representatives

All TurningPoint employees, consultants, contractors, grantees, and associated personnel must:

- Comply with the principles and procedures of this policy



- Report any suspected wrongdoing or malpractice in good faith
- Cooperate with investigations and maintain confidentiality throughout the process
- Avoid any form of retaliation against those who raise concerns

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract.

## 15. Communication and Training

TurningPoint is committed to ensuring that this Whistleblowing Policy—and related ethical and safeguarding policies—are well understood by all staff and associated personnel. Ongoing communication and training are essential to embedding a culture of openness, trust, and accountability.

Training and communication efforts will be proportionate to the roles and risks faced by different individuals across the organisation.

The **Designated Manager**, with support from the **Fiduciary Risk Manager**, is responsible for:

- Ensuring that all employees receive appropriate training on whistleblowing procedures and their rights and responsibilities under this policy
- Promoting awareness and visibility of the Whistleblowing Policy among partners, contractors, grantees, and suppliers
- Ensuring all new staff and associates are introduced to this policy as part of their induction process

Training may be delivered through orientation sessions, refresher courses, written guidance, or dedicated workshops depending on organisational needs.

## 16. Review of Policy

This Whistleblowing Policy will be reviewed **annually**, or earlier if there are significant changes in the legal, regulatory, or operating environment that necessitate an update.

Responsibility for initiating and coordinating the review lies with the **Executive Director**, in consultation with the **Fiduciary Risk Manager** and relevant senior staff. Updates will incorporate learning from practice, feedback, and changes in applicable standards to ensure the policy remains relevant, effective, and aligned with TurningPoint's values and obligations.

### Approved by:

Senior Management Team  
Turning Point Foundation

**Date:** 12 May 2025