



Meeting Point International

Meeting Point International (MPI), Uganda

Whistleblowing Policy

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Signature:	
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1. PREAMBLE

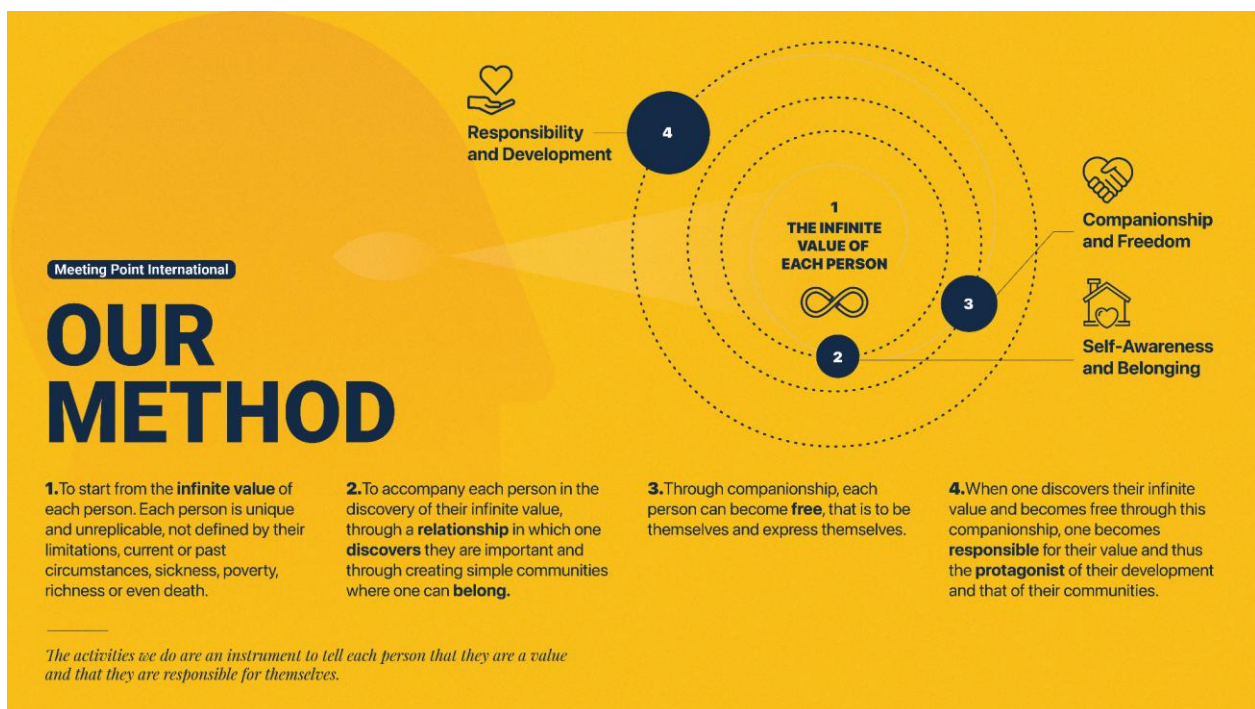
Meeting Point International (MPI) is a Ugandan non-governmental organization founded by Rose Busingye in 1993 and registered in 2003. Its primary goal is to support and accompany people affected or infected by HIV/AIDS, as well as the orphans of those individuals, particularly in the slum areas of Kireka and Naguru in Kampala.

MPI works so that every individual may discover their infinite value and dignity through a journey of personal growth and community development.

2. MISSION

MPI is dedicated to supporting individuals and communities - especially those affected by HIV/AIDS - by promoting education at all levels and actively working towards poverty alleviation.

3. OUR METHOD





MPI has a zero-tolerance policy towards any form of retaliation against individuals who report wrongdoing that breaches MPI's Code of Conduct. This Whistle-blowing Policy reflects MPI's commitment to conducting its mission with honesty and integrity.

The policy provides a confidential and safe channel for reporting suspected wrongdoing as quickly as possible. Concerns raised will be taken seriously, investigated appropriately, and handled in a manner that protects whistleblowers from any fear of reprisals.

Wrongdoing includes, but is not limited to:

- criminal activity
- failure to comply with legal, professional, or regulatory obligations
- miscarriages of justice
- improper or unethical conduct
- threats to health, safety, or the environment
- bribery (as per MPI's Anti-Fraud and Anti-Corruption Policy)
- financial fraud or mismanagement
- fraudulent procurement
- breach of the MPI's policies and procedures
- conduct likely to damage the MPI's reputation or financial wellbeing
- unauthorized disclosure of confidential information
- negligence
- harassment or bullying
- sexual harassment, exploitation, or abuse
- abuse of children or adults at risk
- modern slavery or trafficking
- discrimination (e.g., based on race)
- manager/employee relations issues
- abuse or excessive use of power
- abuse of trust
- undeclared conflicts of interest
- deliberate concealment of any of the above wrongdoing

4. SCOPE

This Whistleblowing Policy applies to:

- All MPI's staff and volunteers.
- All MPI suppliers and consultants, who are required to adopt and comply with this policy. MPI shall explicitly refer to it in all consultancy and/or supply agreements.
- All other entities - including but not limited to implementing partners, external organizations, contractors, and donors - who accept or wish to establish any kind of formal relationship with MPI and agree to abide by this policy.

5. PURPOSE

The purpose of this Policy is to help MPI promote a culture of integrity, responsibility, transparency, and compliance.

The policy aims to:



- Encourage whistleblowers to confidently and freely raise concerns about relevant wrongdoings, by setting out clear principles and procedures for reporting suspected misconduct.
- Provide accessible channels for whistleblowers to report concerns and to receive feedback on any actions taken.
- Reassure whistleblowers that they will be protected after making a disclosure, by establishing procedures that prevent any form of retaliation against those who report in good faith.

This policy should be read in conjunction with the Code of Conduct, the Child Safeguarding Policy, the Prevention of Sexual Exploitation, Abuse and Harassment Policy (PSEAH), and the Anti-fraud and Anti-Corruption Policy.

In implementing this policy, MPI will align, where appropriate, with existing best practices, as set out in the Whistleblowers Protection Act of Uganda, 2010.

6. DEFINITIONS

Whistleblowing: the disclosure by individuals of illegal, unethical, or improper practices that breach the MPI's Code of Conduct.

Whistleblower: an individual who reports a suspected breach of MPI's Code of Conduct or other wrongful acts, whether or not explicitly listed in this policy. Whistleblowers act on the basis of a reasonably held suspicion that wrongdoing has occurred or may occur.

Individual: refers to MPI staff, volunteers, and other partners (both former and current).

Retaliation: any direct or indirect harmful action threatened, recommended, or taken against an individual as a result of reporting suspected misconduct or wrongdoing.

7. OPERATIONAL MODES

7.1. REPORTING

A suspicion of alleged misconduct may be disclosed either orally or in writing through the established internal reporting channels. Disclosures should be made as soon as possible, and ideally within one (1) month of the whistleblower becoming aware of the incident(s).

All forms of information and communication technology may be used to submit a disclosure.

To enable a proper assessment of the nature, extent, and urgency of the matter, the report should be factual and include as much relevant detail as possible, such as:

- Full name, address and occupation of the whistleblower.
- Nature of the misconduct being reported.
- Name and details of the individual alleged to have committed, be committing, or about to commit the wrongful act.
- Time and place where the alleged act occurred, is occurring, or is likely to occur.



- Name, address, and description of any witnesses.
- Whether the whistleblower has previously reported the same or a related issue (including to whom and when).
- For employment-related disclosures, whether the whistleblower remains in the same employment.
- Where possible, any existing information that supports the allegation (e.g., emails, photographs).
- Date the disclosure.

Where a whistleblower makes a disclosure orally, the individual to whom the disclosure is made shall ensure that it is transcribed in writing, containing all the relevant details as are specified. The written statement shall then be read, interpreted, and explained to the whistleblower in a language s/he understands. The whistleblower shall confirm that the information contained is true and correct by certifying the statement and affixing their signature or mark.

Internal reporting channels include:

- directly to the Executive Director
- to the whistleblower's line manager(s)
- to any Senior Manager
- to the Technical Advisor
- through the suggestion box - a confidential channel managed by the Executive Director

MPI extends the protections outlined in this policy to whistleblowers who report alleged misconduct involving the organization personnel to an external entity, authority or individual, provided that the whistleblower did not accept any payment or benefit from any party in exchange for the report, and s/he did not use the internal channels set out above.

Such external reporting will only be considered justified if it was necessary to prevent:

- A significant threat to public health or safety.
- Damage to MPI's operations.
- Violations of national or international law.

In all cases, the Line Manager, Senior Manager, or the Technical Advisor shall refer the matter to the Executive Director, who will acknowledge receipt of the report within three (3) days of its submission.

Anyone reporting a suspicion of alleged misconduct must act in good faith and have reasonable grounds to believe that the information disclosed constitutes a potential breach of the MPI's Code of Conduct.

Any report, accusation, or statement found to be intentionally false, defamatory, misleading, or made with malicious intent or reckless disregard for the truth shall be treated as a violation of MPI's standards of conduct. Such actions may result in administrative or disciplinary measures, in accordance with the procedures applicable to the whistleblower's type of appointment.



7.2. INITIAL EVALUATION OF THE REPORT AND INITIAL INFORMATION

Upon receipt of the report, the ED and Management team will perform an initial assessment about the jurisdiction of the matter and classifies it based on its severity and significance.

Reports of suspected misconduct will be treated with the highest degree of confidentiality, to the extent possible, and in accordance with the need to carry out an appropriate review or investigation. In cases where the whistleblower's testimony is required as evidence, their identity shall only be disclosed with their informed consent.

Disclosures may be referred immediately to the appropriate authorities concerned, such as the police. Likewise, if urgent action is required (e.g., to remove a health and safety hazard), such measures will be taken prior to initiating any investigation.

Risk assessments will subsequently be conducted throughout the process to ensure that no harm comes to any individual involved.

All concerns raised will be acknowledged through verbal or written feedback to the whistleblower, confirming receipt of the report.

To uphold the principles of natural justice and to guard against malicious or unfounded allegations, an initial inquiry will be conducted to determine whether a formal investigation is warranted, and if so, what its scope and format should be.

In order to prevent the occurrence of any retaliation or discriminatory conduct against the whistleblower, the identity of the latter and confidentiality of the information must always be protected.

7.3. PROTECTION OF THE WHISTLEBLOWER

It is understandable that whistleblowers may sometimes be concerned about possible repercussions resulting from the complaints or concerns they raise. MPI, therefore, seeks to promote a culture of openness and will support staff and others who report genuine concerns under this policy, even if those concerns later prove to be unfounded.

Support may include access to specialist psychosocial counselling, medical care, legal assistance, and/or other appropriate professional support based on individual needs.

A whistleblower shall not be subjected to any victimization for having made a protected disclosure. A whistleblower will be considered victimized on account of making such a disclosure where:

- (a) the whistleblower, being an employee, is:
 - (i) dismissed
 - (ii) suspended
 - (iii) denied promotion
 - (iv) demoted
 - (v) made redundant



- (vi) harassed
- (vii) intimidated
- (viii) threatened with any of the matters set out in (i) to (vii)
- (ix) subjected to a discriminatory or other adverse measure by the employer or a fellow employee

- (b) the whistleblower, not being an employee, is subjected to discrimination, harassment, or intimidation by an individual or entity affected by the disclosure.

A whistleblower who honestly and reasonably believes that s/he has been victimized as a result of her/his disclosure may seek redress using the mechanisms and channels outlined in this policy. In extreme cases, the whistleblower may pursue a civil action through the court of law.

In this regard, MPI is furthermore committed to collaborate with other NGOs and relevant authorities to ensure that the support offered to whistleblowers is appropriately diverse in nature.

Reports of suspected misconduct will be kept confidential to the maximum extent possible, consistent with the need to conduct a proper review and, where necessary, an investigation. In cases where the whistleblower is required to provide evidence, the identity will be disclosed only with her/his consent or where legally mandated.

7.4. INVESTIGATION ON THE REPORT-PRODUCTION OF EVIDENCES

All reports of alleged misconduct will be investigated promptly, in a manner intended to protect confidentiality as practicable, consistent with a full and fair investigation.

The investigation on the report will be carried out under the responsibility of the Executive Director, with support of the Technical Advisor. The staff members involved in the investigation will be appointed by the Executive Director, in consultation with the Technical Advisor where appropriate.

If any MPI staff member is found to have knowingly made a false allegation, they will be subject to disciplinary action, up to and including termination of employment. It is important to note that a complaint not being upheld does not necessarily mean it was false – there may simply be insufficient evidence to support the allegation.

8. FOLLOW UP OF THE REPORT AND INFORMATION

SIGNIFICANT CASES

For significant cases, the information on the case is forwarded to the Board of Directors, which decides on the closure of the case in consultation with the Executive Director and the appointed staff in charge. The Executive Director shares the outcome and conclusions of the procedure in a concise and anonymous form, appropriate to the context. Whistleblowers, whose identity is known, are informed about the outcome of the report by the Executive Director.



SERIOUS CASES

For serious cases, the investigation report is shared with the Board of Directors. In such instances, the Board may also assess the need to involve specific professional figures (legal or technical), also external experts, in order to conduct a more in-depth analysis of the reported issue and determine the most appropriate methods of intervention and resolution. Whistleblowers whose identity is known will be informed by the Executive Director upon conclusion of the investigations.

9. POLICY REVIEW

The Executive Director with support of the Technical Advisor is responsible for the administration, interpretation and application of this policy. The policy will be reviewed annually to ensure its effectiveness and relevance by the Executive Director with the support of an appointed staff member. Feedback from staff and stakeholders is encouraged to improve the policy. Annual training on the policy will be done for the staff with support from external individuals or organizations where appropriate.

10. DISCIPLINARY MEASURES

Any retaliatory actions by an MPI Personnel - including contractors, their employees or representatives, or other partners - against a whistleblower for reporting alleged misconduct is a violation of MPI's Code of Conduct and will lead to appropriate administrative or disciplinary actions in accordance with the applicable procedures.

MPI will apply suitable disciplinary measures, up to and including termination of employment, against any employee involved in such retaliation. In cases involving criminal activity, reports will be made to the relevant law enforcement authorities.

11. TRAINING AND DISCLOSURE PROGRAMME

- MPI shall develop and conduct a training programme to equip the personnel and partners with knowledge about the purpose and use of this policy.
- Participation in this training shall be mandatory for all MPI staff. Refresher courses shall be conducted annually.
- In addition, MPI shall provide ongoing role-specific training to staff, tailored to their respective positions, with the goal of enabling them to detect, prevent, and promptly report any practices that violate this Policy.
- MPI shall monitor the completion of all training requirements.

12. ACKNOWLEDGMENT AND AGREEMENT

We, the undersigned representative of _____ (Name of Partner Organization), acknowledge and accept our responsibilities under Meeting Point International's (MPI) Whistleblowing Policy. We understand that this policy exists to promote transparency, integrity, and accountability by providing a safe and confidential mechanism for reporting concerns about misconduct, fraud, safeguarding breaches, or any unethical behavior. We commit to upholding the principles outlined in this policy and to creating an environment in which staff, partners, and beneficiaries feel safe to raise concerns without fear of retaliation. We



further understand that failure to comply with these principles may result in actions, including suspension of funding or termination of partnership, as stipulated in MPI's Whistleblowing Policy.

Name of Partner Organization : _____

Representative Name : _____

Representative Title : _____

Signature : _____

Date : _____

Witness

Name of witness on behalf of MPI : _____

Witness Title : _____

Signature : _____

Date : _____



13. POLICY APPROVAL

The Whistleblowing Policy of Meeting Point International (MPI) is subject to thorough review and approval by the organization's leadership. The approval process includes consultation with key stakeholders such as board members, management, staff, and relevant external partners to ensure the policy aligns with MPI's values, objectives, and legal obligations. By formally endorsing this policy, MPI demonstrates its unwavering commitment to protecting whistleblowers, promoting a culture of openness, and ensuring that all concerns raised are addressed fairly, promptly, and without prejudice.

14. Whistleblowing Policy Acknowledgment Form

I, (Name of Staff)
..... (Position of Staff),
acknowledge receipt of the Safeguarding Policy.

I confirm that I have read, understood, and accepted the policy as part of my employment conditions with Meeting Point International (MPI).

Name : _____

Signature : _____

Date : _____