



Meeting Point International

WHISTLEBLOWING POLICY

Meeting Point International (MPI)

2026

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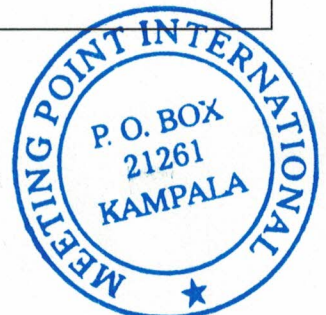




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1. INTRODUCTION

Founded by Rose Busingye in 1992, Meeting Point International (MPI) is a Ugandan non-governmental organization working with women, men, youth and children from the slums of Kampala, who are mainly affected and infected by HIV/AIDS.

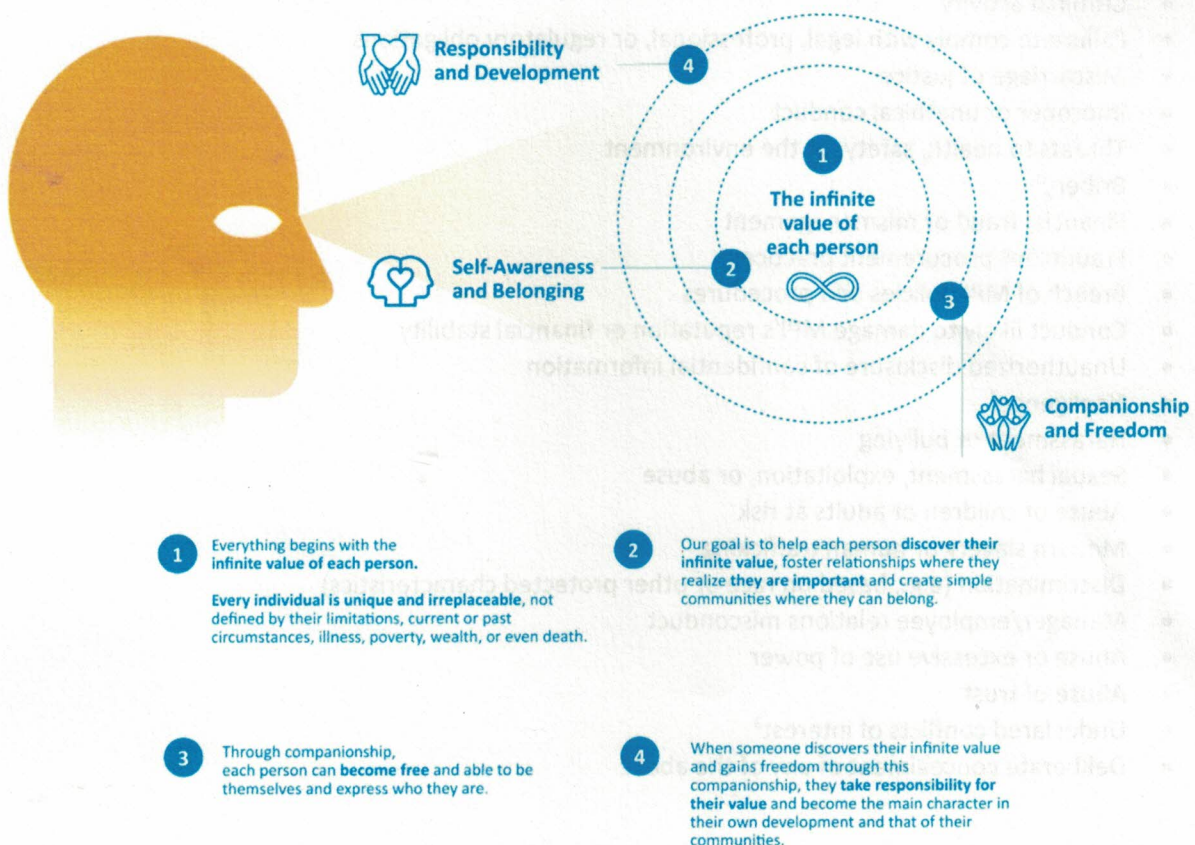
1.1 MPI's Vision

For every person to discover their infinite value and dignity, through a journey towards their own human development and that of their communities.

1.2 Our Mission

MPI aims at continuously accompanying every person and community, prioritizing victims of HIV/AIDS, promoting education at all levels and committing to poverty alleviation.

1.3 MPI's Method





2. POLICY STATEMENT

MPI maintains a **zero-tolerance policy** towards any form of retaliation against individuals who report wrongdoing that breaches MPI's Code of Conduct.

This Whistleblowing Policy reflects MPI's commitment to carrying out its mission with honesty, integrity, and accountability.

The policy establishes a **confidential and secure reporting mechanism** for raising concerns about suspected wrongdoing as early as possible. All reports will be taken seriously, assessed appropriately, and investigated in a manner that ensures protection of whistleblowers from any form of reprisal.

3. WHAT CONSTITUTES WRONGDOING

Wrongdoing includes, but is not limited to, the following:

- Criminal activity
- Failure to comply with legal, professional, or regulatory obligations
- Miscarriage of justice
- Improper or unethical conduct
- Threats to health, safety, or the environment
- Bribery¹
- Financial fraud or mismanagement
- Fraudulent procurement practices
- Breach of MPI policies and procedures
- Conduct likely to damage MPI's reputation or financial stability
- Unauthorized disclosure of confidential information
- Negligence²
- Harassment or bullying
- Sexual harassment, exploitation, or abuse
- Abuse of children or adults at risk
- Modern slavery or human trafficking
- Discrimination (e.g., based on race or other protected characteristics)
- Manager/employee relations misconduct
- Abuse or excessive use of power
- Abuse of trust
- Undeclared conflicts of interest³
- Deliberate concealment of any of the above

¹ Bribery is defined as an inducement or reward offered to gain any commercial, contractual, regulatory, or personal advantage.

² The failure to exercise reasonable care, skill, or diligence in the performance of assigned duties, resulting in actual or potential harm, loss, or risk to individuals, beneficiaries, or MPI's operations.

³ A situation where an individual has a personal, financial, or professional interest that could improperly influence their judgment or decisions, and this interest has not been disclosed to MPI.

4. SCOPE

This Whistleblowing Policy applies to:

- All MPI staff and volunteers.
- All MPI suppliers and consultants, who are required to adopt and comply with this policy. MPI shall explicitly reference this requirement in all consultancy and supply agreements.
- All other entities, including but not limited to implementing partners, external organizations, contractors, and donors, who engage in or seek to establish any formal relationship with MPI and agree to comply with this policy.

5. PURPOSE

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

Specifically, the policy aims to:

- Encourage individuals to confidently and freely report suspected wrongdoing by providing clear principles and procedures for raising concerns.
- Ensure accessible reporting channels are available and that whistleblowers receive appropriate feedback on actions taken.
- Provide assurance that individuals who report in good faith will be protected from any form of retaliation.

This Policy should be read in conjunction with MPI's Code of Conduct, Child Safeguarding Policy, Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, and Anti-Fraud and Anti-Corruption Policy.

Where appropriate, MPI aligns its approach with the **Whistleblowers Protection Act of Uganda (2010)** and other relevant best practices.

6. DEFINITIONS

Whistleblowing: The disclosure of illegal, unethical, or improper practices that constitute a breach of MPI's Code of Conduct.

Whistleblower: An individual who reports suspected wrongdoing or breaches of MPI's Code of Conduct. This includes conduct not explicitly listed in this policy. Whistleblowers act on a reasonable belief that wrongdoing has occurred, is occurring, or may occur.

Individual: Refers to MPI staff, volunteers, and other partners, whether current or former.

Retaliation: Any direct or indirect adverse action, threatened or taken, against an individual as a result of reporting suspected wrongdoing.



7. OPERATIONAL MODES

7.1 Reporting

Suspected misconduct may be reported either orally or in writing through MPI's established internal reporting channels. Reports should be submitted as soon as possible and ideally within one (1) month of the whistleblower becoming aware of the concern.

All available communication tools, including information and communication technologies, may be used to submit a disclosure.

To enable proper assessment of the case, reports should be factual and include as much detail as possible, including:

- Full name, address, and occupation of the whistleblower
- Nature of the alleged misconduct
- Name and details of the person(s) alleged to have committed, be committing, or be about to commit the wrongdoing
- Time and place of the alleged incident(s)
- Names, addresses, and descriptions of any witnesses
- Whether the issue has been previously reported (including when and to whom)
- In employment-related cases, whether the whistleblower is still employed in the same role
- Any supporting evidence available (e.g., emails, photographs, documents)
- Date of the disclosure

Where a report is made orally, the recipient shall ensure it is accurately transcribed in writing. The written record shall be read back, interpreted, and explained to the whistleblower in a language they understand. The whistleblower must confirm its accuracy by signing or marking the document.

Internal reporting channels include:

- Direct reporting to the Executive Director or Technical Advisor
- Report to Safe Guarding Focal Person or a member of the Safeguarding Committee
- Use of the confidential suggestion tools managed by Safe Guarding Focal Person

MPI also extends protection under this Policy to whistleblowers who report concerns externally, provided that:

- No payment or benefit was received in exchange for making the disclosure, and
- Internal reporting channels were not used beforehand.

External reporting will be considered justified where necessary to prevent:

- A serious threat to public health or safety
- Significant damage to mpi operations
- Violations of national or international law

All reports must be escalated by the Line Manager, Senior Manager, or Technical Advisor to the Executive Director, who will acknowledge receipt within three (3) days.

All disclosures must be made in good faith and on reasonable grounds. Any intentionally false, malicious, or misleading report will be treated as misconduct and may result in disciplinary action.



7.2 Initial evaluation of the report and initial information

Upon receipt of a report, the Executive Director with the support of the Safe Guarding Focal Person if needed, will conduct an initial assessment to determine jurisdiction, relevance, and severity of the matter. All reports are treated with strict confidentiality to the greatest extent possible, subject to the need for proper review or investigation. Where the whistleblower is required to provide evidence, their identity will only be disclosed with informed consent.

Where necessary, cases may be referred immediately to relevant authorities, including law enforcement. Urgent protective actions (e.g., removal of health and safety risks) may also be taken prior to formal investigation.

Risk assessments will be conducted throughout the process to ensure protection of all individuals involved.

All whistleblowers will receive acknowledgment of receipt of their report, either verbally or in writing. An initial inquiry will be conducted to determine whether a formal investigation is required, and if so, its scope and methodology. This ensures fairness and helps prevent unsubstantiated or malicious allegations from proceeding further.

The identity of the whistleblower and all related information must remain strictly confidential to prevent retaliation or discrimination.

7.3 Protection of the whistleblower

MPI recognizes that whistleblowers may have concerns about potential consequences of reporting wrongdoing. The organization therefore promotes a culture of openness and will support all individuals who raise genuine concerns in good faith, even if those concerns are not ultimately substantiated. Support may include access to psychosocial counselling, medical care, legal assistance, or other appropriate professional services depending on individual needs.

No whistleblower shall suffer victimization for making a protected disclosure. Victimization includes, but is not limited to:

For employees:

- Dismissal, suspension, or redundancy
- Denial of promotion or demotion
- Harassment, intimidation, or threats
- Discriminatory or adverse treatment

For non-employees:

- Harassment, intimidation, or discrimination by individuals or entities affected by the disclosure

Whistleblowers who believe they have suffered retaliation may seek redress through the mechanisms provided in this Policy. In serious cases, they may pursue legal action through the courts.

MPI is also committed to cooperating with relevant NGOs and authorities to ensure appropriate support mechanisms are available.

Confidentiality of whistleblowers will be maintained at all stages, and identity disclosure will only occur with consent or where legally required.



7.4 Investigation and evidence

All reports of alleged misconduct will be investigated promptly and fairly, ensuring confidentiality as far as practicable while maintaining a full and objective investigation process.

The investigation will be led by the Executive Director with the support from the Safe Guarding Focal Person.

If an MPI staff member is found to have knowingly made a false allegation, disciplinary action may be taken, up to and including termination of employment. However, a report not being upheld does not automatically imply bad faith, as insufficient evidence may also be a factor.

8. FOLLOW-UP OF THE REPORT AND INFORMATION

8.1 Significant and Serious cases

For Significant and serious cases, the Executive Director, in accordance with the Technical Advisor, may authorize the involvement of external experts (legal, technical, or safeguarding specialists) to support deeper analysis and appropriate response measures.

Whistleblowers whose identity is known will be informed of the outcome by either the Safe Guarding Focal Person or the Executive Director upon completion of the investigation.

9. POLICY REVIEW

The Safe Guarding Focal Person, supported by the Safe Guarding Committee, is responsible for the interpretation and application of this Policy.

The Policy shall be reviewed annually to ensure its continued relevance and effectiveness. The review process will be led by the Safe Guarding Focal Person with the support of the Safe Guarding Committee.

Feedback from staff and stakeholders is actively encouraged to strengthen and improve the Policy over time. MPI will also conduct annual training on this Policy for all staff, with support from external experts or organizations where appropriate.

10. DISCIPLINARY MEASURES

Any retaliatory action against a whistleblower by MPI personnel—including staff, contractors, consultants, partners, or representatives—constitutes a breach of MPI's Code of Conduct.

Such actions will result in appropriate disciplinary or administrative measures in accordance with applicable procedures.

Depending on the severity of the case, disciplinary actions may include termination of employment or contract. Where criminal conduct is identified, the matter will be reported to relevant law enforcement authorities.

10.1 Training and disclosure programme

- MPI will develop and implement a training programme to ensure all personnel and partners understand the purpose, scope, and application of this Policy.



- Participation in training is mandatory for all MPI staff. Refresher training will be conducted annually.
- Additional role-specific training will be provided to ensure staff can identify, prevent, and report misconduct effectively.
- MPI will monitor and ensure completion of all required training activities.

11. ACKNOWLEDGMENT AND AGREEMENT

All MPI partners, including implementing partners, consultants, suppliers, and other entities engaged in formal collaboration with MPI, are required to comply with this Whistleblowing Policy as part of their contractual obligations with MPI.

MPI expects all partners to uphold the principles of transparency, integrity, and accountability and to ensure that staff, beneficiaries, and stakeholders are able to report concerns without fear of retaliation.

12. POLICY APPROVAL

This Whistleblowing Policy of Meeting Point International (MPI) is subject to formal review and approval by organizational leadership.

The approval process includes consultation with key stakeholders, including the Board of Directors, management, staff, and relevant external partners, to ensure alignment with MPI's values, objectives, and legal obligations.

By endorsing this Policy, MPI reaffirms its commitment to protecting whistleblowers, promoting a culture of openness, and ensuring that all concerns are addressed fairly, promptly, and without prejudice.



WHISTLEBLOWING POLICY ACKNOWLEDGMENT AND ACCEPTANCE FORM

I, (Full Name)
..... (Position/Role/Organization if applicable),
acknowledge receipt of the Meeting Point International (MPI)'s Whistleblowing Policy.
I confirm that I have read, understood, and accepted the Whistleblowing Policy as part of my employment,
collaboration, volunteer service, consultancy, partnership, or engagement with Meeting Point
International (MPI).

Name : _____
Signature : _____
Date : _____

A copy of the signed Whistleblowing Policy should be returned to the Administration office or to this
email: admin@meetingpoint-int.org