



# ATPS WHISTLEBLOWING POLICY

Contains a clear, accessible, and robust framework that empowers all individuals associated with the ATPS to report unethical, illegal, or inappropriate behavior.

**2022**





# **ATPS WHISTLEBLOWING POLICY**

## **AFRICAN TECHNOLOGY POLICY STUDIES NETWORK (ATPS)**

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**Date:**

**15 January 2022**

## 1. Policy Statement

The African Technology Policy Studies Network (ATPS) is committed to maintaining the highest standards of integrity, transparency, and accountability in all its operations. This whistleblowing policy is established to provide a secure and confidential channel for reporting any form of unethical, illegal, or inappropriate conduct. ATPS encourages all employees, board members, partners, volunteers, and other stakeholders to report any concerns without fear of retaliation. ATPS guarantees that all reports will be taken seriously and investigated thoroughly and impartially. The organization is committed to protecting whistleblowers from any form of retaliation or adverse treatment resulting from their decision to report concerns in good faith. This policy aligns with international ethical standards, including the United Nations Global Compact, International Labour Organization standards, and OECD guidelines, ensuring that ATPS operates with the highest level of ethical conduct. We believe that through a culture of openness and accountability, ATPS aims to reinforce its commitment to ethical leadership and responsible governance. We believe that transparency and ethical behavior are fundamental to achieving our mission and maintaining the trust of our stakeholders. This policy is a testament to ATPS's dedication to upholding these principles in all its activities.

## 2. Purpose of the Policy

The purpose of this whistleblowing policy is to establish a clear, accessible, and robust framework that empowers all individuals associated with the ATPS to report unethical, illegal, or inappropriate behavior. This policy is rooted in ATPS's commitment to upholding the highest standards of integrity, accountability, and transparency across all its operations. By fostering an environment where concerns can be raised without fear of retaliation, ATPS aims to ensure that any form of misconduct is promptly identified and addressed, thereby safeguarding the organization's mission, reputation, and stakeholders.

ATPS recognizes that unethical behavior, whether it be financial mismanagement, corruption, discrimination, or any other form of misconduct, can severely undermine the organization's effectiveness and credibility. As a leading institution in technology policy research and advocacy in Africa, ATPS holds itself to rigorous ethical standards, understanding that the trust placed in it by partners, donors, and the public is fundamental to its success. This policy serves as a key component of ATPS's broader governance framework, which emphasizes ethical conduct, compliance with legal and regulatory requirements, and the promotion of a positive organizational culture.

The policy also reflects ATPS's alignment with international ethical standards and best practices, including principles set forth by global bodies such as the United Nations, the International Labour Organization, and the Organization for Economic Co-operation and Development (OECD). By providing clear guidelines on how to report concerns and outlining the protections available to whistleblowers, this policy not only encourages the reporting of misconduct but also ensures that such reports are handled with the utmost care and confidentiality. Ultimately, the goal of this policy is to reinforce ATPS's dedication to ethical leadership and responsible stewardship in all its activities.

## 3. Scope

This policy applies to all individuals associated with ATPS, including but not limited to employees, board members, consultants, volunteers, contractors, partners, and members of the public who interact with ATPS. The policy covers a wide range of unethical and illegal activities, such as:

- a) **Financial Misconduct:** Fraud, embezzlement, misappropriation of funds, or any form of financial irregularities.
- b) **Corruption and Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the

actions of an ATPS official or employee.

- c) **Legal and Regulatory Violations:** Any actions that violate local, national, or international laws and regulations.
- d) **Discrimination and Harassment:** Any form of discrimination or harassment based on race, gender, age, disability, sexual orientation, religion, or any other protected characteristic.
- e) **Health and Safety Violations:** Actions or conditions that endanger the health and safety of individuals associated with ATPS.
- f) **Environmental Misconduct:** Activities that harm the environment or violate environmental laws and regulations.
- g) **Confidentiality Breaches:** Unauthorized disclosure or misuse of confidential information.
- h) **Other Unethical Conduct:** Any other actions that undermine the integrity, mission, or values of ATPS.

## 4. Reporting Mechanisms

### 4.1 Confidential Reporting Channels

- **Email:** Individuals can report concerns via a dedicated email address: [whistleblowing@atpsnet.org](mailto:whistleblowing@atpsnet.org). This email is monitored by the dedicated personnel appointed by the Executive Director, ensuring confidentiality.
- **Telephone Hotline:** A confidential whistleblowing hotline will be established, accessible 24/7. The number will be published on the ATPS website and in all relevant internal documents.
- **Online Reporting Form:** An encrypted online reporting form will be made available on the ATPS website, allowing for anonymous submissions.

### 4.2 Anonymity and Confidentiality

ATPS respects the choice of whistleblowers to remain anonymous. All reports will be treated confidentially, and the identity of the whistleblower will not be disclosed without their consent, unless required by law. Even in cases where anonymity is waived, the whistleblower's identity will be shared only with those who need to know to conduct a proper investigation.

### 4.3 Protection Against Retaliation

ATPS has a zero-tolerance policy towards retaliation. Any form of retaliation against individuals who report concerns in good faith, including but not limited to harassment, demotion, dismissal, or any other adverse action, is strictly prohibited. Retaliation will be treated as a serious violation of this policy and may result in disciplinary action, including termination of employment.

## 5. Handling of Reports

### 5.1 Receipt and Acknowledgement

Upon receipt of a report, the ATPS management will acknowledge it within five business days, provided contact information is available. The acknowledgment will include information on the next steps and the expected timeline for the investigation.

### 5.2 Preliminary Assessment

The ATPS management will from time to time appoint a dedicated personnel who will be in-charge of whistle-blowing issues. The dedicated personnel working with departmental heads will form an ad-hoc committee which will conduct a preliminary assessment to determine the validity of the report and whether it falls within the scope of this policy. If the report is deemed credible, a full investigation will be initiated. Reports that do not fall within the scope of this policy will be referred to the appropriate agencies.

### 5.3 Investigation

Investigations will be conducted promptly, thoroughly, and impartially. Depending on the nature of the allegations, investigations may be carried out internally or by engaging external experts or legal counsel. The investigation process may include interviews with relevant parties, review of documents and records, and any other actions necessary to gather evidence.

### 5.4 Outcome and Actions

Upon completion of the investigation, a report will be prepared detailing the findings and recommended actions. If the allegations are substantiated, ATPS will take appropriate corrective actions, which may include disciplinary measures, legal action, or other remedies as necessary. The whistleblower will be informed of the outcome, provided it does not violate confidentiality or legal requirements.

### 5.5 Appeals

If the whistleblower is dissatisfied with the outcome of the investigation, they may appeal the decision to the ATPS Board. The appeal must be lodged within a specified timeframe, and the decision of the appeal body will be final.

## 6. International Ethical Standards

ATPS is committed to adhering to international ethical standards and best practices, including:

- **United Nations Global Compact (UNGC):** ATPS aligns with the UNGC principles, particularly in the areas of human rights, labor standards, environmental protection, and anti-corruption.
- **International Labour Organization (ILO) Standards:** ATPS upholds the ILO's standards on workplace rights, including the elimination of forced labor, child labor, discrimination, and the right to collective bargaining.
- **OECD Guidelines for Multinational Enterprises:** ATPS commits to the OECD's guidelines, which provide recommendations on responsible business conduct, including transparency, human rights, and anti-bribery measures.
- **ISO 37001 Anti-Bribery Management System:** ATPS endeavors to comply with the ISO 37001 standard, which provides guidance on preventing, detecting, and addressing bribery.

## 7. Training and Awareness

ATPS will provide regular training to employees and stakeholders on the whistleblowing policy, including how to recognize and report unethical behavior, the protection available to whistleblowers, and the importance of upholding the organization's ethical standards.

## 8. Review and Amendments

This policy will be reviewed annually or as needed to ensure its continued relevance and effectiveness. Any amendments to the policy will be approved by the ATPS Board and communicated to all stakeholders.

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**ANNEX 1: WHISTLEBLOWING REPORTING FORM**



**AFRICAN TECHNOLOGY POLICY STUDIES  
NETWORK (ATPS)**

8th Floor, Chancery Building, Valley Road  
P. O. Box 10081-00100, Nairobi, Kenya  
Email: [executivedirector@atpsnet.org](mailto:executivedirector@atpsnet.org)  
Phone No: +254-202714092

**ATPS Whistleblowing Reporting Form**

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**Section 1: Personal Information (Optional)**

**1.1 Name**

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.....

**1.2 Email Address**

.....  
.....

**1.3 Contact Number**

.....  
.....

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**Section 2: Details of the Incident**

**2.1 Date of Incident**

.....  
.....

**2.2 Location of Incident**

*(Please provide the location where the incident occurred)*

.....  
.....

**2.3 Description of the Incident**

*(Please provide a detailed description of the misconduct or unethical behavior you are reporting. Include specific details such as names, dates, and any other relevant information.)*

.....  
.....  
.....  
.....

**2.4 Type of Misconduct**

*(Tick all that apply)*

- Fraud or Financial Mismanagement
- Corruption or Bribery
- Legal or Regulatory Violations
- Discrimination or Harassment
- Health and Safety Violations
- Environmental Misconduct
- Confidentiality Breach
- Other (Please Specify)

**2.5 Supporting Evidence**

*(Please upload any relevant documents, images, or files that support your report)*

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**Section 3: Additional Information**

**3.1 Have you previously reported this incident to anyone else within ATPS?**

*Yes/No (Choose one)*

**3.2 If Yes, please provide details (e.g., who you reported it to, date of the report, and any actions taken so far):**

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**3.3 Do you have any suggestions for how ATPS should address or resolve this issue?**

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**Section 4: Declaration**

**4.1 Do you agree that the information provided in this report is accurate to the best of your knowledge?**

*Yes/No (Choose one)*

**Section 5: Submission**

**5.1 How would you prefer to be contacted about this report?**

*(Select one)*

- Email
- Phone
- I prefer not to be contacted

Other (Please Specify)



African Technology Policy Studies  
Network (ATPS)

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## SCIENCE TECHNOLOGY AND INNOVATION FOR AFRICAN DEVELOPMENT

The African Technology Policy Studies Network (ATPS) is a transdisciplinary network of researchers, policymakers, private sector actors and the civil society promoting the generation, dissemination, use and mastery of Science, Technology and Innovations (STI) for African development, environmental sustainability and global inclusion. In collaboration with like-minded institutions, ATPS provides platforms for regional and international research and knowledge sharing in order to build Africa's capabilities in STI policy research, policymaking and implementation for sustainable development.