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| Title: | Whistleblowing Policy |
| Policy statement: | <p>DSPR is committed to maintaining the highest standards of openness, integrity, and accountability in keeping our values.</p> <p>An essential part of accountability and transparency is a mechanism to enable staff and other people associated with DSPR to voice concerns responsibly and effectively.</p> <p>When someone (internal or external) discovers information that they believe shows serious malpractice, unacceptable practices, or wrongdoing within the organisation, this information should be disclosed without fear of reprisal. Arrangements should enable this to be done independently of line management. The process for doing this is found in the whistleblowing procedure and the wrongdoing that is disclosed must be in the public interest.</p> |
| Procedures: | <p>The purpose of the whistleblowing procedures is to provide a confidential mechanism for employees and stakeholders to report concerns about unethical, illegal, or improper conduct within the organization, without fear of retaliation. This applies to identification of concerns including: Fraud, Corruption, Breach of any policy, discrimination or harassment or any other unlawful acts.</p> <p>See Annex 1 for Whistleblowing Procedures</p> <p>See Annex 2</p> <p>Annex 3: Training & Awareness Guidelines PowerPoint orientation package</p> |
| Definitions: | <p>The concern raised should relate to specific malpractice or wrongdoing by a staff member, consultant, contractor, or volunteer, where DSPR has direct control over the possible solution. The list below shows the types of malpractice or wrongdoing that should be reported; however, this is not an exhaustive list:</p> <ul style="list-style-type: none"> - a person has, will, or is likely to commit fraud/theft or bribery - a person has, will, or is likely to abuse or exploit another person - child/ adult at risk/ project participant, e.g. sexual or physical abuse - a person has, will, or is likely to participate in criminal or illegal activity - the organisation or a person within the organisation has, will or is likely to engage in unacceptable fundraising practices - a person has, will or is likely to endanger the health and safety of people and \ or the environment. - a person has, will or is likely to corrupt/abuse an organisational practice/procedure, e.g. logistics team may not correctly follow a practice or procedure |



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| | <ul style="list-style-type: none"> - a person has, will or is likely to do something illegal, e.g. breach of contract, negligence, damage/misuse of property. - a person has, will or is likely to behave in a way that is not in line with the Code of Conduct. |
| Related Policies & Procedures: | <ul style="list-style-type: none"> - Code of conduct - Conflict of interest policy - Safeguarding Policy - Fraud and bribery policy - FCRM |
| Why is the policy needed: | It promotes transparency and accountability among DSPR's stakeholders; it protects DSPR against legal and reputational risks. |
| Who must follow this policy: | <p>This policy applies to all staff and associates.</p> <p>Staff includes:</p> <ul style="list-style-type: none"> ● all staff, national and international ● all volunteers and interns <p>Associates include:</p> <ul style="list-style-type: none"> ● all contractors, e.g., consultants, relative vendors, contracts etc. (printing, videographers, etc) ● all Board Members ● all partners including local community-based partners ● Guests and Visitors |



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| Next formal review: | [Next review and approval date within 3 years of the above date or sooner if legislation, best practice or other circumstances indicate that it is necessary]; May 2028 |
| Person responsible: | DSPR Executive Director AC Executive Directors |
| Version: | 11 June 2025 |
| Approved by: | Central Committee Members: Dr. Audeh Butros Audeh Quawas; Chairperson-Member at Large- Representing Orthodox Church Family Mr. Bassem Issa Audeh Thabet Vice- Chair- Delegate DSPR-ICC Jerusalem & WB Area Committee Dr. Farah Atallah Farah Attallah; Treasurer- Delegate DSPR-NECC Jordan Area Committee Bishop Sani Ibrahim Charly Azar; Member at Large- Representing Episcopal – Lutheran Church Family Mrs. Sandra Tawfiq Habesch Khoury; Member at Large- Representing Catholic Church Family Dr. Jean Salaminian; Member at Large- Representing Eastern Orthodox Church Family Mr. George Jamal Jamil Antone; Delegate DSPR-NECC Gaza Area Committee Mr. Adel Nasser; Delegate DSPR-ICCI Galilee Area Committee MS. Nina Farah Shaddad; Delegate DSPR-JCC Lebanon Area Committee |
| Approval date: | Central committee meeting: 4 July 2025 |



Annex 1: Whistleblowing Procedures

Step 1: Initial Report Submission

- Report can be submitted through:
 - **Internal reporting channels:** Online portal, email, hotline, in-person.
 - **Anonymous reporting,** if desired.

- Information to include:
 - Description of the concern
 - Date(s) of incident(s)
 - Individuals involved
 - Evidence, if available



See Annex 2: Whistleblowing Reporting Form

Step 2: Acknowledgment of Receipt

- Within **5 working days**, the whistleblower should receive (from DSPR):
 - An acknowledgment (unless anonymous)
 - Outline of the process and estimated timelines

Step 3: Preliminary Assessment

- Whistle blow report to be reviewed by an assigned **Whistle blow contact person** or **Ethics Committee** to assess the following:
 - Credibility of the report
 - Relevance and severity of allegations
 - Need for further investigation

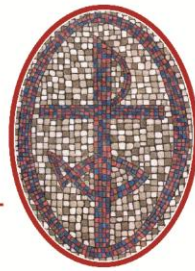
Step 4: Investigation

- **Formal investigation** launched if warranted
- Investigators may include HR, Legal, or compliance
- Confidentiality maintained throughout
- Timeline: Within **30 working days**

Step 5: Outcome & Feedback

- Investigation outcome documented:
 - Substantiated
 - Unsubstantiated
 - Inconclusive
- Appropriate corrective or disciplinary actions taken
- Feedback provided to the whistleblower (if identity known)

Step 6: Protection Against Retaliation



- Strict prohibition on retaliation
- Monitoring and support provided to the whistleblower
- Retaliatory actions may result in disciplinary measures

Step 7: Appeals or Follow-up

- Whistleblower may request a review if dissatisfied
- Reviewed by a higher authority or independent officer



Annex 2: Draft Whistleblowing Reporting Form

Strictly Confidential

Instructions:

Please complete this form to report any suspected wrongdoing, unethical behavior, or misconduct.

You may remain anonymous, but providing your contact information can help in investigating the matter thoroughly.

SECTION 1: Whistleblower Information (Optional)

- **Name:** _____
- **Position/Department:** _____
- **Phone Number:** _____
- **Email Address:** _____

Would you like to remain anonymous?

- Yes No

SECTION 2: Report Details

- **Date of Incident(s):** _____
- **Location of Incident(s):** _____
- **Type of Concern (select all that apply):**
 - Fraud or financial misconduct
 - Corruption or bribery
 - Harassment or discrimination
 - Health and safety violation
 - Breach of policy
 - Other (please specify): _____

- **Person(s) Involved:**
(Include names, roles, and any relevant relationships)

- **Description of Concern:**
(Provide as much detail as possible – what happened, when, where, how, and who was involved)



• **Do you have any evidence?**

Yes No

If yes, please describe or attach documents/files:

• **Have you reported this issue to anyone else?**

Yes No

If yes, please provide details:

SECTION 3: Desired Outcome

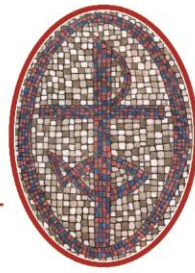
- **What outcome or action are you expecting from this report?**

SECTION 4: Declaration

I confirm that the information provided is true to the best of my knowledge. I understand that knowingly submitting false information may result in disciplinary or legal action.

Signature (if not anonymous): _____

Date: _____



Annex 3: Training & Awareness Guidelines PowerPoint orientation package