



CHRIST IS THE  
ANSWER MINISTRIES  
[CITAM]

DOCUMENT TITLE:	<b>WHISTLE BLOWING POLICY</b>		
DOCUMENT NUMBER:	REFERENCE:		
ISSUE No:	REVISION: 000	EFFECTIVE DATE:	
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## WHISTLE BLOWING POLICY

### APPROVALS

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### REVISION HISTORY

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## 1. PURPOSE

The purpose of this policy is to ensure that all CITAM staff and stakeholders are protected from any form of danger or victimization because of exposing any violation. The policy shall ensure that all the reported cases are investigated and acted upon by relevant offices as stipulated.

## 2. SCOPE

This policy applies to all CITAM Staff and all functional areas. It covers how violations are captured, reported, investigated, and closed. The policy shall protect all the whistle blowers at all levels.

## 3. DEFINITIONS

- CITAM – Christ is the Answer Ministries
- Whistle blower- Any individual who exposes a violation of any nature.
- Malpractice – improper or unethical conduct by a professional or official person
- Violation – an infraction or failure to follow CITAM rule, policy, law, constitution or desecration

## 4. RESPONSIBILITIES

**Presiding Bishop** – It is the responsibility of the Presiding Bishop to ensure implementation and operation of this policy.

## 5. POLICY

### 5.1.1 Policy

#### 5.1.1.1 Reporting Responsibility

- a) This Whistleblower Policy is intended to encourage and enable employees and others to raise alarm on internal malpractices/violations so that CITAM can address and correct inappropriate conduct and actions.
- b) It is the responsibility of CITAM Governance organ members, Managerial team, employees, and volunteers to report concerns about violations of CITAM's code of ethics or suspected violations of law, policies/ regulations that govern CITAM's operations.

#### 5.1.1.2 Retaliation

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- a) It is contrary to the values of CITAM for anyone to retaliate against any Governance organ members, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of CITAM.
- b) An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action which may include termination of employment.

#### **5.1.1.3 Acting in Good Faith**

- a) Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.
- b) Any allegations that cannot to be substantiated and made maliciously or known to be false will be viewed as a serious disciplinary offense.

#### **5.1.1.4 Confidentiality**

- a) Violations or suspected violations may be submitted on a confidential basis by the complainant.
- b) Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

#### **5.1.1.5 Report Handling Process**

- a) Whistle blower shall raise the violation/malpractice with the Presiding Bishop, having gathered sufficient evidence regarding the violations.
- b) The Presiding Bishop shall form an investigative team depending on the nature and parties mentioned in the allegations. The investigative team shall include legal officer, Human Resources Manager and Audit & Risk Manager unless any of them is mentioned adversely, he or she shall be excluded.
- c) The investigation team shall conduct the investigation in line with the relevant standards.
- d) The investigation team shall prepare the report and communicate to Presiding Bishop on the findings and recommendations.

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e) The Presiding Bishop shall review the report and take appropriate action

#### **5.1.1.6 Protection of Whistle-blowers**

All whistleblowing concerns must be treated in the strictest confidence and CITAM pledges to take all reasonable steps to protect the identity of the whistleblowers from any detriment within the ministry i.e. their names will not be revealed without their consent unless required by law.

The whistle-blower must satisfy themselves, to a reasonable level, of the occurrence of the wrongdoing disclosed as a concern. The whistleblowing concerns can relate to past, present, or future events. For a disclosure to be protected it must be made through the right channels to the right person, as provided for in this policy. The whistle-blower must:

- Make the disclosure in good faith (which means with honest intent and without malice).
- Reasonably believe that the information is substantially true;

An employee should not suffer detriment as a result of raising a whistleblowing concern. For example, continued employment, opportunities for future promotion and training of an employee must not be negatively affected because he/she has made a whistle-blow within the terms detailed above.

### **6. APPLICABLE REFERENCES**

- The Constitution of Kenya
- CITAM Constitution
- CITAM By-laws
- Communication Commission of Kenya Bill
- Applicable Professional Standards
- CITAM Ethical Standards