



# **WHISTLE BLOWING POLICY**

**INTERNAL AUDIT DEPARTMENT**

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## **BISP WHISTLE BLOWING POLICY**

### **1. OBJECTIVE OF THE POLICY**

The objective of this policy is to provide platform to BISP employees and other interested parties for identifying any irregularity, embezzlement/ malpractice, fraud, wrongdoing in confidential manner without any fear of adverse consequences and to safeguard the BISP's reputation, maintaining integrity and disbursement of cash grants / financial assistance to the beneficiaries.

This policy will elucidate the whistle blowing process for lodging of complaints and redressal thereof.

### **2. SCOPE**

Whistle Blowing Policy applies to all Employees of the BISP and other interested parties. This policy must be readily accessible to all and should be part of any induction programme for new Employees.

Employee's personal grievances and other administrative issues of personal interest shall not be covered under this policy and will be dealt under relevant Rules & Procedures of BISP.

### **3. RESPONSIBILITIES**

#### **3.1 Whistle blowing Unit**

The owner of the policy is the Director General Internal Audit/SIU BISP. Internal Audit wing will also be serving as the Whistle Blowing Unit. With this responsibility, Director Internal Audit (Whistle Blowing unit) will report to the DG Internal Audit/SIU. The Director Internal

Audit (Whistle Blowing Unit) will recommend to the Director General for further probe through the Special Investigation Unit. If the complaints relates to the beneficiaries then it will be send to the concerned / dealing Wing. The Director General Internal Audit/SIU will initiate the investigations through SIU into the complaints received through the Whistle Blowing mechanism.

### 3.2 BISP BOARD

The Board may make amendments to the Policy from time to time. Board may also set standards and guidelines for implementation of the policy. *The Report on the implementation of the policy, including specific actions taken under the policy will be presented to the Board annually unless there is some significant issue that has been uncovered.*

The Audit Committee of the Board will review any proposals regarding any amendments to the policy and before submission to the Board. The Audit Committee will review the quarterly report mentioned above before submission to the Board, on the format specifying, complaints received from whom, nature and disposal status.

## 4. PRINCIPLES

### 4.1 Confidentiality

The personal information of the complainant will be kept confidential and guaranteed by the management. The management shall ensure that the identity of the whistle blower will not disclose at any stage. The identity of the whistle blower will not be disclosed without his written consent except for inevitable circumstances where the identity of the Whistle blower is necessary to disclose (for instance his / her statement / evidence is needed in court of law). The management will ensure that the complainant shall not be discriminated due to lodging of complaint in good faith.

#### 4.2 Good Faith Allegations

Complainants / Whistle blower lodging any allegation / complaint in good faith without malicious intent or knowingly to be false shall be saved from any type of harassment, discrimination or repercussions. Any type of harassment, discrimination or repercussions against the complainant / WB will be viewed as misconduct and liable to disciplinary action.

#### 4.3 False Whistle Blowing

Whistle Blowing Policy is designed not to encourage anyone who maliciously raises baseless and false allegations. Management of BISP may initiate disciplinary action or any other administrative action against the employees or outsiders if it is proved that false allegations are being leveled with malicious intent or to evade responsibility.

#### 4.4 Anonymous Complaints

Anonymous complaints shall not be encouraged.

#### 4.5 Rewards

Whistle Blower may be rewarded on substantiation of reported matter/concern in order to encourage the practice of whistle blowing culture as deterrent against any fraudulent practices. The decision of reward will be the discretion of the Audit Committee / Management of the BISP and shall be taken after the investigation into the complaint has been completed and the allegation raised by the whistleblower has been finally proved.

#### 4.6 Training & Awareness

Training and awareness will be provided to all BISP employees in respect of whistle blowing policy's scope, procedures and their importance. All BISP Field Offices and HQ shall display the scope of policy at prominent places / Notice Board particularly for awareness of employees that

personal nature grievances and other administrative issues of personal interest will not be covered in this Policy.

#### 4.7 Communication Channels for lodgment of Whistle blow

The process and procedures for lodging a complaint with necessary contact detail will be displayed at BISP headquarters, Regional, Divisional and Tehsil Offices at prominent places for awareness of the employees.

#### 4.8 Revision & Amendment

Director General (Internal Audit) / Special Investigation Unit, shall be responsible for keeping this document updated from time to time. Whistle blowing policy & procedures shall be subject to formal review on a periodic basis at least once in every three year and the proposals for any amendment / modification shall be submitted to the BISP Board / Audit Committee for approval.

#### 4.9 Effective Date

The policy & procedures shall be effective as and when approved by the BISP Board and notified by the management.

## Part-II

**5. WHISTLEBLOWER'S PROTECTION PROCEDURES****5.1 Communication of Whistle Blow**

- Any BISP employees may report / lodge complaints or identify the wrong doings, malpractices, fraud/embezzlement in writing or electronically through email to Whistle Blowing Unit /SIU followed by a hard copy through registered mail marked as confidential addressed to the Head of Whistle Blowing Unit of BISP.
- A separate Email account have created for the purpose of complaints received through email which is as : [wbu@bisp.gov.pk](mailto:wbu@bisp.gov.pk)
- Custodian of the Whistle Blowing email account shall be the head of Whistle Blowing Unit / SIU.
- The person lodging the complaint / whistle blower will have to provide complete name and designation.
- The complaints regarding violation of rules / regulation / SOPs for involving financial irregularities, fraud and embezzlement against officers directly superior to the employee only shall be entertained.
- The complaints shall be expected to provide or indicate documentary evidence or witness where possible, along with the complaint will be reported directly to the Head of Whistle Blowing Unit / SIU by using any of the following methods:
  - In writing under private and confidential cover to the Head of Whistle Blowing Unit at BISP Office Address at F Block Pak Secretariat, Islamabad.
  - All written complaints can also be sent through a secure email address at [dg.ia@bisp.gov.pk](mailto:dg.ia@bisp.gov.pk)

- By calling to Director Whistle Blowing Unit at dedicated line: **051-9246022**
- Whistle blower / complainant can meet with the Head of Whistle Blowing Unit in person to report the issue / mater.
- Complaints should be submitted once only through any one of the above means.
- Head of the Whistle Blowing Unit will be personally responsible to ensure that the identity of the whistleblower is protected in all circumstances. The name of the whistleblower shall be redacted while forwarding the complaint to any other officer after recording the name in a confidential database / register in the personal custody of the head of the Whistle Blowing Unit. The original complaints in hard copy or in electronic form will never be forwarded to any other office.

## 5.2 Processing of Whistle blowing cases

- Upon receiving of complaint, the Director Whistle Blowing will enter the complaint into a Whistle Blowing Register (Annexure-A) affixing the date and assigned a 3digit sequential number code. This code will be used in referencing, subsequent processes including investigation and reporting of the allegation. Information regarding identity of Whistle Blower / Complainant will be kept secret under all circumstances.
- If the complaints relates to the beneficiaries then it will be send to the concerned / dealing Wing.
- Head of Whistle Blowing Unit will conduct preliminary inquiry in respect of collecting relevant / necessary information of the matter as early as possible *but not exceeding to 15 working days. Exceptions can be allowed in complex cases with the approval of Director General I.A.* All offices of BISP will be required to provide all requisite documentation and record to the Head of Whistle Blowing Unit as and when needed.



- After making initial fact finding inquiry, a report will be presented to Director General Internal Audit with a recommendation for further detailed investigation through Special Investigation Unit of the BISP, if it is found that the complaint is prima facie based on facts. If on the other hand the complaint is found to be malicious, based on the mala fides or intended to cover the misconduct, inefficiency or corruption of the whistleblower, a separate inquiry without further reference to the name of the whistleblower may be recommended.
- On receipt of the recommendations Director General (Internal Audit) will apply his/her mind and ordered investigation as recommended by the Head of Whistle Blowing Unit or otherwise.
- A report on the work of the Whistle Blowing Unit including the complaints received, the complaints closed at the preliminary stage, the complaints on which detailed investigations have been ordered and status of each of these detailed investigations and their results will be submitted to the Audit Committee of the Board in each of its meetings.
- The cases without sufficient indication of evidences or having no specific information will be referred back to the SIU for closing at initial assessment stage. The database / register will be updated marking the complaint as closed and the whistleblower will be informed accordingly.
- A report will be submitted to the Director General Internal Audit on a weekly basis regarding the cases closed by the Head of Whistle Blowing Unit at a preliminary stage.
- If the allegations are proved as a result of detailed investigations against employee/deputationists of BISP, DG IA will present the report of such of the detailed

investigations to Secretary BISP with recommendations for criminal proceedings and or disciplinary action.

- Cases of Reward to Whistle Blower shall be initiated by the SIU recommended by the DG IA and approved by the Audit Committee on the basis of supporting evidence.

**Annexure-A -Whistle Blowing Register**

Sr No.	Whistle Blow Detail											Whistle blow inquiry		Final response submitted to whistle blower	Whistle Blow Status									
	Initial Inquiry Detail											Whistle Blow ESCALA TED (If detail inquiry required)			Whistle Blow Status	Closing Date	Remarks							
	To whom complaint addressed	Date	Whistle blow No.	Whistle blow Name	Whistle blower Contact#	Whistle blower Address	Nature /Type of whistle Blow	Detail of Whistle Blow	Name of Office	Branch / Department	Employee Name	Designation	New / Repeat	Employee Name				Designation	Initial Investigation Date	Initial Investigation Mode	Initial Investigation Results	Action Taken By WBU	Escalation / Detail	Designation