



Student Christian Organization of Malawi



Whistle Blowing and Complaints Policy Manual

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GLOSSARY

Complaint: An allegation or concern that is subject to investigation by the appropriate authority.

Detriment: Victimization or reprisal of a whistleblower can take any or a combination of the following forms; dismissal, termination, redundancy, undue influence, duress, withholding of benefit and/or entitlements, and any other act that has hurts the whistleblower.

Good Faith: This is evident when a report or concern is made without malice or consideration of personal benefit and the employee has a reasonable basis to believe that the report is true; provided, however, a report does not have to be proven to be true to be made in good faith. Good faith is lacking when the disclosure is known to be malicious or false.

Investigation: A process designed to gather and analyze information in order to determine whether misconduct has occurred and if so, the party or parties responsible.

Misconduct: A failure by a staff member or other relevant stakeholder to observe the rule of conduct or standards of behavior prescribed by an organization.

Suspect: A person who is alleged to have committed a misconduct and is subject to investigation.

The Organization: SCOM and all its subsidiaries.

Whistleblower/Complainant: Whistleblower- Any person(s) including employees, management, General secretary, depositors, service providers, creditors, and other stakeholders of an institution who reports any form of unethical behavior or dishonesty to the appropriate authority. Complainant- any person(s) or party who conveys or is proven to be about to convey a concern, allegation, or any information indicating that Fraud, Corruption, or any other Misconduct is occurring or has occurred in the organization or the organization's Project; with the knowledge or good faith belief that the concern, allegation or information is true.

Whistleblowing: Whistleblowing The act of reporting an observed/perceived unethical misconduct of employees, management, General secretary, and other stakeholders of an institution by an employee or other person to the appropriate authority. It is an early warning system that enables an organization to find out when something is going wrong in time to take necessary corrective action.

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1.0 BACKGROUND

The Student Christian Organization of Malawi, SCOM, is an indigenous interdenominational Christian organization founded by the Nyasaland Council of Churches in 1961 and is registered under the Trustees Incorporation Act Section 5.03 of the Laws of Malawi. SCOM was founded to champion the holistic development of students in post-primary academic institutions enabling them to serve Christ as Lord and Savior on campus and beyond.

2.0 INTRODUCTION

This section covers the purpose, definition of key terms and scope of the policy.

2.1 PURPOSE AND OBJECTIVES

The purpose of this policy is to:

Enable SCOM staff and other relevant stakeholders to report any perceived act of impropriety which should not be based on mere speculation, rumors, and gossip but on knowledge of facts.

Reportable misconducts covered under this policy include but are not limited to:

- 2.1.1 All forms of financial malpractices or impropriety such as fraud, corruption, bribery, blackmail theft, and concealment;
- 2.1.2 Failure to comply with legal obligations, statutes, and regulatory directives; Actions detrimental to Health and Safety or the work environment;
- 2.1.3 Any form of criminal activity;
- 2.1.4 Improper conduct or unethical behavior that undermines universal and core ethical values such as integrity, respect, honesty, accountability, and fairness;
- 2.1.5 Miscarriage of justice
- 2.1.6 Other forms of corporate governance breaches;
- 2.1.7 Connected transactions not disclosed or reported in line with regulations;
- 2.1.8 Insider abuse;
- 2.1.9 Non-disclosure of interests;
- 2.1.10 Endangering the health and safety of an individual including students.

- 2.1.11 Sexual or physical abuse of staff, customers, prospective staff, service providers, and other relevant stakeholders; and
- 2.1.12 Attempt to conceal any of the above-listed acts.
- 2.1.13 The above-listed reportable misconducts or concerns are not exhaustive. However, judgment and discretion are required to determine misconduct that should be reported under this policy. The general guide in identifying reportable misconduct is to report concerns that are repugnant to the interest of the Organization and the general public and appropriate sanctions applied.
- 2.1.14 This policy covers the activities of SCOM and all the subsidiaries within the Organization. This is without prejudice to the requirements by regulators of the various subsidiaries to put in place their respective whistleblowing policies. Furthermore, this policy shall be read in conjunction with SCOM's constitution and code of conduct. The policy shall also be read in conjunction with the whistleblowing guidelines that may be issued by relevant regulatory agencies with oversight of the operations of the Organization's subsidiaries.
- 2.1.15 Finally, this policy does not cover individual staff grievances and other employee-related matters already covered in the code of conduct of SCOM.

Specific objectives of the policy are:

- 2.1.16 To ensure all employees feel supported in speaking up in confidence and reporting matters they suspect may involve improper, unethical, unspiritual or inappropriate conduct within the Organization;
- 2.1.17 To encourage all improper, unethical, or inappropriate behavior to be identified and challenged at all levels of the organization;
- 2.1.18 To provide clear procedures for reporting and handling such concern(s);
- 2.1.19 To proactively prevent and deter misconduct that could impact the financial performance and damage the organization's reputation;
- 2.1.20 To provide assurance that all disclosures will be handled seriously, treated as confidential, and managed without fear of reprisal of any form; and
- 2.1.21 To help promote and develop a culture of openness, accountability, and integrity.

2.2 DEFINITION OF KEY TERMS

Complaint for the purpose of this policy is any expression of dissatisfaction by an individual, whether justified or not. And;

Whistleblowing for the purpose of this policy is the act of reporting perceived ethical conduct of employees, General Secretary, and other stakeholders by an employee and other persons to appropriate authorities.

2.3. SCOPE OF THE POLICY

This policy and procedure guideline is intended to encourage staff and other relevant stakeholders to report perceived concerns, unethical or illegal conduct of employees, management, General secretary, and other stakeholders across the Organization to appropriate authorities in a confidential manner without any fear of harassment, intimidation, victimization or reprisal of anyone for raising concern(s) under this policy.

This policy and procedure guideline outlines SCOM's Policy on whistleblowing and complaints procedures for investigating and dealing with all reported cases of illegal and unethical conduct and any other misconduct, concerns and complaints across the organization. This policy is in compliance with the requirements of various regulatory authorities with oversight on the activities of the Organization on whistleblowing, and complaint reporting.

3.0 BOARD AND MANAGEMENT COMMITMENT TO THE POLICY

The Board and Management are aware that a robust internal system for employees and other relevant stakeholders to disclose workplace concerns, malpractices without fear of reprisal shows that employees take their responsibilities seriously, and also helps to avoid the negative publicity that often accompanies disclosures to external parties.

Hence NEC Board and Management is committed to promoting a culture of openness, accountability, and integrity, and will not tolerate any harassment, victimization, or discrimination of the whistleblower provided such disclosure is made in good faith with reasonable belief that what is being reported is fact.

4.0 POLICY STATEMENT

SCOM is committed to the highest standards of openness, probity, accountability, and high ethical behavior by helping to foster and maintain an environment where employees and other stakeholders can act appropriately, without fear of reprisal. To maintain these standards, the Organization encourages employees and relevant stakeholders who have material concerns about suspected misconduct or any breach or suspected breach of law or regulation that may adversely impact the Organization, to come forward, raise and report them through appropriate channels (in certain cases on a confidential basis) without fear of retribution or unfair treatment.

The Organization is committed to investigating promptly any reported misconduct and to protecting those who come forward to report such activities. The Organization further assures that all reports shall be treated in strict confidence. This policy is intended to investigate and take appropriate action against any complaint and reported misconduct or concern.

5.0 ROLES & RESPONSIBILITIES

The following are the roles and responsibilities of key parties in the whistleblowing process:

S/N	Responsible Officer	Responsibilities
1	Whistleblower/Complainant	Whistleblowers/Complainants are expected to act in good faith and should refrain from making false accusations when reporting his/her concern(s), and also provide further evidence at his/her disposal to aid investigation of the issues reported.
2	Suspect	The Suspect must cooperate during the period of investigation including the provision of relevant information, documents, or other materials as may be required by the investigator.

3	Investigator/ Appointed Personnel, SCOM	The Head of Internal Audit is expected to handle all matters with high professionalism, confidentially, and promptly. He/She shall be independent and unbiased in carrying out an investigation. The Head of, Internal Audit has the responsibility of acknowledging all concern(s) reported and reporting on the progress of the investigation to the whistleblower. The Head, of Internal Audit, shall every quarter provide to the Chairperson of SCOM Board Audit & reported and the result of the investigation. The Appointed Personnel/Investigator shall refrain from discussing or disclosing matters under investigation.
4	Head of Human Resources	The Head of Human resources of each operating company within the Organization shall handle the report of investigation that relates to the entity's employees in line with the laid down disciplinary Procedure as contained in the entity's code of conduct.
5	SCOM Board and Integrity Committee	The Chairperson, SCOM Board, and the general Secretary shall make available to all committee members the quarterly report submitted by the Head of Internal Audit on whistleblowing, and also treat all whistleblowing concern(s) brought to the attention of the committee with dispatch.

6	Appointed Personnel, SCOM.	Review, and update the Whistleblowing & Complaints Policy and procedure and obtain requisite Board approval.
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6.0 WHISTLEBLOWING PROCEDURE

The whistleblowing and complaints procedure involves steps that should be taken by the whistleblower in reporting misconduct, and steps required for the investigation of the reported misconduct. The following procedures shall guide the whistleblowing process:

6.1 INTERNAL WHISTLEBLOWING PROCEDURE

Internal whistleblowing involves staff members across the Organization raising concerns about unethical conduct. The following procedure shall be adopted for internal whistleblowing:

S/N	Steps	Action
1	Step One Raising concern(s) by a whistleblower – medium, and format.	An internal whistleblower may raise a concern through any of the following media (this can be done either by declaration or in confidence/ anonymously): ▪ Formal letter to the Organization’s General Secretary, SCOM. Or the Appointed Personnel, SCOM ▪ Dedicated phone number/ communicator chat. 0 887 208 016 ▪ Dedicated email address: scommalawi@gmail.com ▪ Via SCOM’s website:

		www.scommalawi.org
2	Step Two Investigation of Concerns and update on the progress of the investigation.	The Head, of Internal Audit shall on receipt of the concern(s) acknowledge receipt of the concern from the whistleblower within 2 working days, and immediately commence the investigation. The purposes of the investigation are to: a. Establish if wrongdoing has occurred based on the concern(s) raised, and if so to what extent; and b. To minimize the risk of further wrongdoing, prevent any further loss of assets, or damage to the Organization's reputation, and or if possible, protect all sources of evidence. If a preliminary investigation shows that the concern falls within the whistleblowing reportable concerns, then further investigation shall be carried out. If otherwise or the concern is outside the reportable misconduct, then the Head, Internal of the audit shall refer the matter to appropriate quarters for further action. Where necessary the Head, Internal of Audit shall provide an update on the progress of the

		investigation to the whistleblower if the concerns fall within the reportable concerns. Finally, if the concern raised by the whistleblower is frivolous or unwarranted, the Appointed Personnel shall ignore such concern, and where necessary disciplinary measures in line with Human Resources policy shall apply to the staff involved.
3	Step Three Report of Investigation and action on the report.	Upon conclusion of the investigation, the Head, of Internal Audit shall submit his/her report to the Human Resources or the appropriate authority for further action(s). Where necessary the Head, of Internal Audit shall escalate to the Organization's General Secretary. However, a quarterly report to keep the Organization's General Secretary abreast of developments in whistleblowing shall be submitted by the Head, of Internal Audit. All disciplinary action relating to the report shall follow the Organization's disciplinary procedure as contained in the code of conduct. Finally, if the concern raised by the whistleblower is frivolous or unwarranted, the Appointed Personnel shall ignore such concern, and where necessary disciplinary measures in line with Human Resources policy shall apply to the staff involved.

4	Step Four Non-Satisfaction with the result the of investigation/action	If the whistleblower is not satisfied with the extent of the investigation and or the action taken based on the outcome of the investigation, the whistleblower is at liberty to report to the Chairperson of the SCOM Board and Integrity Committee.
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Any internal whistleblower that feels victimized can report his/her grievance(s) to the Chairperson, SCOM Board, and Integrity Committee. This is without prejudice to the fundamental right of the internal whistleblower to seek redress in a court of law.

6.2 EXTERNAL WHISTLEBLOWING PROCEDURE

External whistleblowers are non-staff of the Organization. External whistleblowers can fall into any of these categories: contractors, service providers, shareholders, depositors, analysts, consultants, job applicants, and the general public. External whistleblowing shall follow the following procedure:

S/N	Steps	Required Action
1	Step One Raising concern(s) by whistleblower: - medium and format.	An external whistleblower may raise a concern through any of the following media (this can be done either by declaration or in confidence/anonymously): - By a formal letter to the Organization's Integrity Committee SCOM, or Appointed Personnel. - Dedicated phone number as contained on the social media pages and website: www.scommalawi.org, Facebook, Twitter, and other platforms. - Dedicated email address: scommalawi@gmail.com - Directly to the Head, of Internal Audit, SCOM.

		Where the concern is received by staff other than the Organization's Integrity Committee and the Appointed Personnel, the recipient of such concerns shall be required to; - Immediately pass the concern(s) to the Integrity Committee with a copy to the Organization's Head, of Internal Audit, but ensuring confidentiality of the concern. - If the concerns affect the Integrity Committee, or the Head, of Internal Audit, SCOM's General Secretary Shall be notified. And where the General Secretary he/she is involved, such concern shall be directed at the Chairperson, SCOM Board. The concern(s) shall be presented in the following format; - Background of the issue (with relevant dates) - Reason(s) why the whistleblower is particularly concerned about the situation. - Disciplinary measures in line with the code of conduct shall be taken against any staff that receives concerns from an external whistleblower and fails to the pass same to the appropriate authority.
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2	Step Two Investigation of Concerns and update on the progress of the investigation.	The Integrity Committee, which includes Head of Internal Audit shall on receipt of the concern(s) acknowledge receipt from the whistleblower within 2 working days, and immediately commence an investigation. The purpose of the investigation is to: a. Establish if wrong-doing has occurred based on the concern(s) raised, and if so to what extent; b. To minimize the risk of further wrongdoing, prevent any further loss of assets, or damage to the Organization's reputation, and if possible, protect all sources of evidence. If the preliminary investigation shows that the concern falls within the whistleblowing reportable concerns, then further investigation shall be carried out. If otherwise, the Head, of Internal Audit shall refer the matter to the appropriate quarters for further action. However, if the concern raised by the whistleblower is frivolous or unwarranted, disciplinary action shall be taken Where it is established, that criminal activity has taken place, the matter may be referred to the Malawian Police Force, and where necessary, appropriate legal action taken. Where necessary the Head, of Internal Audit shall provide an update of the progress of the investigation to the whistleblower.
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3	Step Three Report of Investigation and action on the report.	Upon conclusion of the investigation, the Integrity Committee shall submit its report to the General Secretary, SCOM or the appropriate authority for further action(s). Where necessary, the Head of Internal Audit shall escalate to the Organization's General Secretary. However, a quarterly report to keep the Organization's General Secretary abreast of developments in whistleblowing shall be submitted by the Head of Internal Audit. If the concern(s) relates to a General Secretary, the matter shall be referred to the Chairperson, SCOM Board & Integrity Committee for further action. If the concern(s) relates to an external party (service provider), the Organization shall immediately review the Service Level Agreement with such service provider, and if necessary, terminate the agreement.
4	Step Four Non-Satisfaction with the results of investigation/action.	In the event that the whistleblower is not satisfied with the results of investigation and or the action taken based on the outcome of the investigation, the whistleblower is at liberty to report to the Chairperson of the SCOM Board and Integrity Committee for further action.
An external whistleblower shall be at liberty to report to appropriate to the regulatory body or seek further redress in a court of law If he/she is not satisfied with the action taken to address the concern(s).		

7.0 COMPLAINT PROCEDURE

7.1 CONCERN OR COMPLAINT

It is important to establish the difference between a concern and a complaint. Taking informal concerns seriously at the earliest stage will reduce the likelihood of them developing into formal complaints.

If you have any concerns about our work, please tell The First Step worker or their manager as soon as possible, so they can quickly understand your concerns and try to put things right.

If you are not happy with the response to your concern and/or you want to make a formal complaint please follow the procedure below

SCOM aims to settle the majority of complaints quickly and satisfactorily by the member of staff who provides the service. The complaint may be resolved quickly by way of an apology or by an acceptable explanation to the individual.

There are three stages to the complaint's procedure:

- Stage One – the complaint
- Stage Two – investigation
- Stage Three – appeal

7.2 STAGE ONE – THE COMPLAINT

The complaint can be written or if the individual prefers, they can tell someone at SCOM, or someone else, who will write it down for them. The complainant will need to sign it. A complaint form is available to use.

Individuals wishing to make a complaint should contact the person who provided the service, or their line manager. Alternatively, they can contact SCOM by writing to scomalawi@gmail.com ; we also have suggestion boxes in SCOM's national and regional offices.

The complaint should include the complainants name and address, the nature and date of the complaint and how they want to see it resolved. SCOM complaints form can be requested and can be sent to the complainant or collected by the complainant.

On receipt, each complaint will be allocated a reference number and logged on the complaints register. Complainants must receive an acknowledgement within five working days of receipt of a signed complaint.

7.3 STAGE TWO – INVESTIGATION

All complaints at this stage should be dealt with by a service leader. If they need to meet with the complainant, they will do so within seven working days of receiving the written complaint. Complaints will be fully investigated and a written response provided to the complainant within twenty working days by the investigator.

The complainant will receive written confirmation of the outcome of any investigation any recommendations/remedies made, such as reviewing of policies, staff development and training or appropriate improvement to SCOM services. The outcome should not refer to any individual employees or groups of employees within SCOM.

Where the complaint is upheld, an apology should be offered. Occasionally investigations may take longer, particularly if the complaint is complex. Should this be the case a holding letter will be sent after twenty working days and a final date given for a conclusion to be reached.

If an individual remains dissatisfied with the outcome from Stage Two, they can appeal within fourteen working days of the date of the outcome and progress to Stage Three. The complaints register will be updated and any pending complaints flagged so they are followed up

7.4 STAGE THREE - APPEAL

If the complaint cannot be resolved to the complainant's satisfaction at stage two, or if the service leader feels that the complaint is of a very serious nature, or concerns a service leader then it will be referred to General Secretary.

If the complaint is about General Secretary, then the matter will be discussed with two Appointed personnels.

General Secretary and/or Appointed personnels will acknowledge receipt within five working days, they will review the Stage Two investigation and recommend one of the following actions within twenty working days (from the date the complainant stated they wanted to take the complaint to stage 3):

- Uphold the action taken by SCOM at Stage Two
- Make changes to the Stage Two recommendation/actions

The complainant should be informed in writing of the outcome of stage three, the decision reached about this complaint will then be final but other options available to the complainant (as listed below) should be detailed in the letter.

If after SCOM has been through the three stages and the complainant is still not satisfied with the result, they should be advised that there is no further right of appeal with SCOM but they could approach any of the following agencies for advice:

- A solicitor
- Any, Malawian District Council

This should be done within one month of receiving the outcome from the appeal.

7.5 ANONYMOUS COMPLAINTS

Complaints received anonymously will be recorded and considered, but action may be limited if further information is required to ensure a full and fair investigation.

7.6 MONITORING

Complaints are an important tool which, alongside data provided by exit surveys, stakeholder surveys, user feedback and focus groups, will allow SCOM to learn about the services we provide. They provide a useful source of information about how individuals see our services and

how we are serving them. To ensure SCOM can learn from complaints the following data will be collected:

- Name and address
- Name of person dealing with the complaint
- Date of complaint and response
- Nature of complaint
- Action(s) taken/recommendations made in response to the complaint - Lessons learnt

Complaints information will be considered on a regular basis by the Management Team and reported annually to SCOMs NEC board. Wherever possible the data will be used to improve and develop the service.

8.0 TIME LIMIT FOR INVESTIGATION

It shall be the policy of the Organization to handle investigations promptly and as fairly as possible. While it might not be possible to set a specified time frame for the conclusion of the investigation since the diverse nature of potential concerns may make this impracticable. The appointed personnel to lead the investigations, shall endeavor to resolve all concerns within four weeks. Where for any reason, the proper resolution is unable to be achieved within this time frame; the Appointed Personnel advise Organization's General Secretary accordingly, and report to the Chairperson, SCOM, Board and Integrity Committee.

9.0 PROTECTION AND COMPENSATION FOR WHISTLEBLOWER AND COMPLAINANT

To process a complaint, SCOM will hold personal data about the complainant, which the individual provides and which other people give in response to the complaint. SCOM will hold this data securely and only use it to address the complaint. The identity of the person making the complaint will only be known to those who need to consider the complaint and will not be revealed to other people or made public by SCOM. However, it may not be possible to preserve confidentiality in some circumstances, for example, where relevant legislation applied or allegations are made which involve the conduct of third parties.

SCOM will normally destroy complaints files in a secure manner six years after the complaint has been closed.

It shall also be the policy of the Organization to protect whistleblowers who disclose concerns, provided the disclosure is made;

- In the reasonable belief that it is intended to show malpractice or impropriety;
- To an appropriate person or authority; and
- In good faith without malice or mischief.

While all disclosures resulting from whistleblowing shall be treated with high a level of confidentiality, staff and other relevant stakeholders are encouraged to disclose their names to make the report more credible. The Organization consider the following ration, in considering unanimous disclosure:

- The seriousness of the issues being reported;
- The significance and credibility of the concern; and
- The possibility of confirming the allegation.

The Organization shall not subject a whistleblower to any detriment. Where a whistleblower feels unfairly treated owing to his/her actions, the whistleblower shall be at liberty to report to the CONGOMA, NGO Board, and any other regulatory body with oversight of the Organization`s businesses. This is without prejudice to the right to take appropriate legal action.

Where necessary, compensation of whistleblowers whether internal or external that have suffered detriment shall be at the discretion of Management taking into consideration regulatory guidance on compensation of whistleblowers issued from time to time.

Any retaliation, including, but not limited to, any act of discrimination, reprisal, harassment, suspension, dismissal, demotion, vengeance, any, other occupational detriment, direct or indirect, recommended, threatened, or taken against a whistleblower because he/she has made disclosed accordance with this policy will be treated as gross misconduct and dealt with accordingly.

Whistleblowers must ensure that they do not make disclosure outside of the prescribed channels (e.g., media-print or electronic), or their disclosures may not be protected.

10.0 CONGOMA AND NGO BOARD

SCOM being a member of CONGOMA and NGO Board in Malawi, shall be subject to the regulation of the CONGOMA or NGO Board-Whistle. This policy and procedure guideline shall be read in conjunction with the -Whistle policy guidelines.

The various concerns(s) or disclosure which fall within the CONGOMA and NGO Board - Whistleblowing are:

- Stakeholder abuse
- Financial fraud; and
- Undeclared conflict of interest

Although anyone with information about a violation or potential violation of any rule, regulation, or law guiding the faith community can use the CONGOMA and NGO Board - Whistle, disclosure shall not be limited to any of under listed members or stakeholders in the faith community:

- Any student in the public or private institution
- SCOM-AF
- Malawi Council Churches
- Employees and General Secretaries of faith-based organizations
- Media Professionals
- Auditors and Reporting Accountant
- The staff of regulatory bodies.
- International Fellowship of Evangelical Students (FES)
- Evangelical Association of Malawi

Further information on the operation of the CONGOMA and NGO Board - Whistleblowing guidelines should be directed to; congoma@gmail.com, or ngoboard@gmail.com. All disclosures made to the CONGOMA and NGO Board - Whistle portal will be handled in line with laid down procedures.

11.0 WIDER DISCLOSURE

A whistleblower/Complainant whether internal or external may elect to disclose directly to any of the following regulatory bodies that have oversight on the activities of SCOM

S/N	Regulator	Address
1	NGO Board	Address
2	CONGOMA	Address
3	Malawi Police Service	Address
4	Evangelical Association of Malawi	Address
5	Ministry of Education	Address

12.0 EMBEDDING A STRONG WHISTLEBLOWING AND COMPLAINTS REGIME ACROSS THE ORGANIZATION

While regulation and best practices in corporate governance require irrespective of their size and location to have a Whistleblowing & Complaints Policy, SCOM believes that simply having a Whistleblowing & Complaints Policy is not enough to create a culture in which employees are genuinely encouraged to disclose unethical behaviors.

In creating an enabling environment which that ensures that the whistle-blowing regime is effective across the Organization; subsidiaries are required to adopt the following measures:

S/N	Measures	Remark

1	Board and Management commitment	The Board and Management of subsidiaries are to clearly support and sponsor whistleblowing & Complaints in their entities. This will include respecting the policy and dedicating a senior management staff preferably the Head of Investigation as the advocate for whistle-blowing, who shall be authorized to implement and undertake investigation.
2	Communication & Training	All employees in subsidiaries should be aware of the existence of a whistleblowing regime. This can be achieved through regular compulsory training by Compliance Department, newsletters, emails, and presentations. Annual declaration by all staff of having read and understood the policy shall also be encouraged.
3	Proper Investigation and Action	All whistleblowing disclosures or concerns must be investigated promptly and properly, and appropriate action taken upon conclusion of the investigation. Furthermore, all whistleblowing investigations shall be kept confidential.
4	Feedback on the effectiveness of the policy.	Regular surveys on the effectiveness of the policy should be conducted at regular intervals preferably by Compliance Department. Such questions to gauge employee satisfaction or survey shall include: - Have you read the Whistleblowing & Complaints Policy? - If yes, when last did you read the policy? - Do you know who to contact to make a disclosure?

		- Do you feel you work in an open environment in which you are encouraged to speak up and you can safely voice any concerns without fear of reprisal? - What would you change about how the policy operates? - Are you comfortable with the name (“whistleblowing”) of the policy? - If no, what another name will you suggest?
5	Reward	Reward systems to encourage a strong and effective whistleblowing culture can be institutionalized in the subsidiaries. Departments can be assessed on the average number of man-hours of training that the team attended on whistleblowing training.

13.0 OWNERSHIP AND FREQUENCY OF REVIEW

This policy document remains the property of SCOM However, its custody and management shall rest with the Appointed Personnel to head the whistle blowing and complaints, and SCOM.

This policy document and procedure guideline shall be subject to review every two (2) years or as may be deemed necessary. All suggestions for review and or amendments shall be forwarded to the Appointed Personnel, and SCOM for necessary action.

Although this document shall be hosted in the official website of SCOM, the Management of the Organization and each subsidiary shall ensure strict compliance with this policy.