



	<b>GLOBAL WHISTLE BLOWER AND COMPLAINT MECHANISM POLICY</b> <b>Annex A- DISSEMINATION PROCEDURE</b>
Applicable to	All iMMAP personnel
Issued date	December 1 <sup>st</sup> , 2020

## **1. PURPOSE**

This Procedure aims to clarify and provide guidance to iMMAP personnel, HQ and field missions on how to disseminate the principles of the Global Whistle Blower and Complain mechanism Policy including contact details of the dedicated Company.

## **2. DISSEMINATION PROCEDURE**

### **iMMAP personnel:**

The Whistle Blower and Complaint Mechanism Policy is provided by the HR Director at the moment of the signing of the contract with any new international personnel and by the HR Focal Point at mission level for any local national personnel. The Whistle Blower and Complaint mechanism Policy is both part of the contractual package and the total Global Safeguarding and Anti-Discrimination Policy Package. The signing of the contract means that the person has read and understood the Whistle Blower and Complaint Mechanism Policy.

### **iMMAP sub-contractors and implementing partners:**

The Global Whistle Blower Policy is disseminated by the Contract Management Focal Point at mission level together with the contractual package. The Whistle Blower and Complaint Mechanism Policy is part of both the contractual package and total Global Safeguarding and Anti-Discrimination Policy Package. It is mentioned in the list of annexes in the contract/Supply Purchase Order and by signing of the contract the sub-contractor/ implementing partner acknowledges that they have read and understood the Whistle Blower and Complaint Mechanism Policy.

If training is planned for sub-contractors/implementing partners, the Complaint Mechanism shall be explained through a dedicated session by the Contract Management Focal Point and Field Coordinator. This training is *compulsory* when the sub-contractor/implementing partner has staff working in iMMAP projects and in direct contact with beneficiaries. This training can also be done at the same time as the training of iMMAP staff according to resources.

The Contract Management Focal point and Field Coordinator are responsible to ensure this introductory session is conducted.

In case the sub-contractors and implementing partner has staff implementing iMMAP activities in the field in direct contact with beneficiaries and hosting communities, iMMAP will provide specific and approved communications materials related to the Complaint Mechanism to be distributed to beneficiaries.

### **Beneficiaries/hosting communities:**

Beneficiaries and hosting communities are not provided with the text of the Whistle Blower and Complaint Mechanism Policy but they are directly covered by its principles. Each individual receiving the support of iMMAP projects, being in contact with iMMAP personnel, has the right to express a concern about iMMAP personnel and/or iMMAP sub-contractors/implementing partners' behavior that may have breached humanitarian principles and harmed this individual.

iMMAP aims to ensure the Whistle Blower and Complaint Mechanism Policy mechanism covers



also third parties such as beneficiaries and hosting communities, despite the majority of its programs does not have a direct implementation in the field.

In order to do this, iMMAP shall work in two ways according to 2 specific cases:

1. iMMAP has its own personnel implementing activities in the field and being in direct contact with affected communities:

- The Project Manager and Field Coordinator have the responsibility to train all field personnel/enumerators on the Whistle Blower Policy principles and on how to use the Lighthouse Company Complaint Mechanism.
- The Project Manager and Field Coordinator are responsible to ensure that the approved iMMAP communication material on the Complaint Mechanism is adequately disseminated by the field personnel/enumerators to each family/focal point met.

2. iMMAP implements the field activities through a sub-contractor/implementing partner, thus the local partner/sub-contractor's personnel are in direct contact with the affected communities:

- The Contract Management Focal Point and Field Coordinator have the responsibility to ensure that the sub-contractor/local partner has well understood the Whistle Blower and Complaint mechanism Policy principles, how to use the Lighthouse Company Complaint Mechanism and how this mechanism can be used by beneficiaries and hosting communities.
- The Contract Management Focal Point and Field Coordinator have the responsibility to ensure that the approved iMMAP communication materials on the Complaint Mechanism are properly disseminated and explained to the sub-contractor/implementing partner's staff working in the field.
- The sub-contractor/implementing partner has the responsibility to ensure that the approved iMMAP communication materials on the Complaint Mechanism is adequately disseminated by the sub-contractor/implementing partners' personnel with each family/focal point met.