



**CENTRE FOR DEVELOPMENT
— IN SOCIAL JUSTICE —**
A People-Centered Development

CENTRE FOR DEVELOPMENT IN SOCIAL JUSTICE (CDSJ)

WHISTLEBLOWER PROTECTION POLICY



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1. Title

This instrument shall be known as the **CDSJ Whistleblower Protection Policy**.

2. Effective Date

This Policy shall take effect on the date of its formal approval by the competent governance authority of the Centre for Development in Social Justice and shall remain in force until amended, replaced, or repealed in accordance with the CDSJ Policy Framework and other applicable governing instruments.

3. Purpose

The purpose of this Policy is to establish a safe, credible, confidential, and accountable framework for the making, receiving, recording, assessing, protecting, investigating, and responding to protected disclosures concerning wrongdoing affecting the Centre for Development in Social Justice.

This Policy is intended to:

- a) encourage early and good-faith reporting of misconduct, unlawful conduct, corruption, fraud, abuse, safeguarding concerns, serious policy violations, and other institutional wrongdoing;
- b) protect whistleblowers and other reporting persons from retaliation, intimidation, victimisation, harassment, or other adverse treatment;
- c) provide clear internal reporting channels and escalation pathways;
- d) strengthen institutional integrity, transparency, accountability, and risk management;
- e) support compliance with legal, fiduciary, governance, donor, and ethical obligations; and
- f) ensure that serious concerns are handled fairly, confidentially where appropriate, and with due regard to both protection and due process.

4. Legal and Institutional Basis

- This Policy is adopted pursuant to the Constitution of the Centre for Development in Social Justice, the CDSJ Policy Framework, the Board Governance and Oversight Charter, and other relevant governance and administrative instruments of the organisation.
- This Policy shall be read together with all related CDSJ policies, including those relating to ethics, conflicts of interest, anti-fraud and corruption, safeguarding, child protection, sexual harassment, grievances and complaints, disciplinary processes, human resources, records management, data protection, and risk management.
- CDSJ is headquartered in Lesotho but intends to operate regionally. Accordingly, this Policy is adopted as an organisation-wide policy intended to apply across all current and future jurisdictions in which CDSJ lawfully operates, subject to applicable law in each country of operation.

5. Scope and Application

This Policy applies to all persons acting for, on behalf of, or in association with CDSJ, including:

- a. members of CDSJ;
- b. governance members, including members of the AGM, the Global Strategic Advisory Board, the Governing Council, the Executive Committee, and any other formally recognised governance structure;
- c. all employees, whether permanent, temporary, seconded, fixed-term, part-time, or contractual;
- d. consultants, interns, fellows, volunteers, associates, contractors, and other associated personnel;



- e. applicants, former staff, former associated personnel, and persons seeking to engage with CDSJ where relevant to a disclosure;
- f. partners, sub-grantees, vendors, service providers, consortium members, and collaborating institutions where they wish to report wrongdoing affecting CDSJ; and
- g. community members, participants, beneficiaries, or third parties who wish to report serious concerns connected to CDSJ conduct, systems, resources, representatives, or activities.

This Policy applies to protected disclosures relating to wrongdoing that has occurred, is occurring, or is reasonably suspected to be likely to occur in connection with CDSJ.

6. Policy Statement

CDSJ is committed to fostering a culture in which concerns about wrongdoing can be raised safely, responsibly, and without fear of retaliation.

CDSJ shall take all reasonable steps to:

- a. provide safe and accessible reporting channels;
- b. receive and record protected disclosures appropriately;
- c. assess disclosures promptly and fairly;
- d. maintain confidentiality to the fullest extent reasonably possible;
- e. protect whistleblowers, witnesses, and other relevant persons from retaliation or victimisation;
- f. ensure that credible concerns are reviewed, investigated, escalated, or otherwise addressed appropriately; and
- g. respond to wrongdoing in a fair, lawful, and proportionate manner.

CDSJ shall not tolerate retaliation against any person who makes a protected disclosure in good faith, seeks advice regarding a disclosure, participates in an inquiry, or refuses to participate in wrongdoing.

7. Guiding Principles

All implementation of this Policy shall be guided by the following principles:

7.1 Good-Faith Reporting: Persons should be encouraged to report honestly held concerns without needing to prove wrongdoing before reporting.

7.2 Protection from Retaliation: No person should suffer adverse treatment for making a protected disclosure or assisting a legitimate inquiry.

7.3 Confidentiality: Disclosures shall be handled discreetly and confidentially to the fullest extent reasonably possible, consistent with proper review, investigation, legal obligations, and fairness.

7.4 Timely Response: Concerns should be acknowledged, assessed, and acted upon within a reasonable time.

7.5 Fairness and Due Process: Persons implicated in disclosures shall be treated fairly, and findings shall not be assumed before proper review.

7.6 Accessibility: Reporting channels should be reasonably accessible to staff, governance actors, associated personnel, and affected third parties.

7.7 Non-Intimidation: CDSJ shall not permit a culture of silence, intimidation, or fear around reporting.

7.8 Accountability: All protected disclosures and their handling should be documented, reviewable, and subject to institutional oversight.

8. What May Be Reported

A protected disclosure may relate to any serious concern connected to CDSJ, including but not limited to:

- a. fraud, corruption, bribery, theft, embezzlement, or financial misconduct;
- b. abuse of authority, improper influence, favouritism, or serious conflict of interest;
- c. safeguarding concerns, including abuse, exploitation, neglect, or serious risk of harm;
- d. child protection violations;
- e. sexual harassment, sexual exploitation, sexual abuse, or serious workplace misconduct;
- f. serious discrimination, victimisation, retaliation, or bullying;
- g. unlawful conduct or serious regulatory non-compliance;
- h. procurement manipulation, contract abuse, or donor fund misuse;
- i. deliberate falsification of records, reports, evidence, timesheets, or institutional documentation;
- j. serious breach of CDSJ policy, fiduciary duty, or ethical standards;
- k. deliberate concealment of wrongdoing;
- l. gross misuse or wastage of institutional resources;
- m. serious threats to health, safety, security, or wellbeing; or
- n. any other conduct that materially threatens the integrity, legality, accountability, or mission of CDSJ.

This Policy is not intended to replace ordinary management channels for routine workplace concerns that are better addressed under line management, grievance, or HR procedures, unless the issue involves serious wrongdoing, retaliation, concealment, or abuse of process.

9. What Is a Protected Disclosure

A protected disclosure is a report, concern, complaint, or communication made in good faith by a person who reasonably believes that wrongdoing has occurred, is occurring, or may occur in relation to CDSJ.

A disclosure may still be protected even if:

- a. the concern later proves to be mistaken;
- b. the person does not have full evidence at the time of reporting;
- c. the report is made verbally first and documented later; or
- d. the person requests confidentiality or anonymity.

A disclosure is not protected merely because it is labelled a whistleblower report. Deliberately false, malicious, fabricated, or recklessly dishonest allegations are not protected.

10. Anonymous and Confidential Reporting

CDSJ may receive anonymous reports and shall assess them to the extent reasonably possible based on the information provided.

Anonymous reporting may make follow-up, evidence verification, and protection measures more difficult, but anonymity alone shall not be a reason to dismiss a credible concern.

Where a person provides their identity but requests confidentiality, CDSJ shall protect that identity to the fullest extent reasonably possible, subject to:

- a. the need to assess and investigate the matter properly;
- b. legal disclosure obligations;
- c. safeguarding or security considerations; and
- d. fairness requirements in disciplinary or legal processes.

11. Good Faith and Reasonable Belief

- A person makes a disclosure in good faith when they genuinely believe the concern is real and raise it honestly for a legitimate institutional purpose.
- A person is not required to prove wrongdoing before reporting. However, they must not knowingly provide false information, fabricate evidence, or misuse this Policy to harass, defame, manipulate, or intimidate another person.

12. Reporting Channels

A protected disclosure may be made through any appropriate reporting channel, including:

- a) a line manager, where it is safe and appropriate to do so;
- b) the next level of management, where the line manager may be implicated or unavailable;
- c) Executive Management;
- d) a designated whistleblower focal point, ethics focal point, compliance focal point, or HR focal point;
- e) the finance lead, safeguarding focal point, or procurement lead where the subject matter is relevant;
- f) the Chairperson or appropriate governance authority where senior leadership may be implicated or here governance escalation is necessary;
- g) a formally established hotline, email address, online portal, complaints box, or other approved reporting mechanism; or
- h) any alternative route designated by CDSJ where ordinary channels are compromised.

CDSJ may maintain multiple reporting channels in order to support access, independence, and safety.

13. Emergency and High-Risk Reporting

- Where the disclosure concerns immediate risk to safety, ongoing abuse, active destruction of evidence, ongoing diversion of funds, serious safeguarding risk, or imminent harm, the recipient of the disclosure must escalate the matter urgently and without unnecessary delay.
- Where the concern involves a child or serious safeguarding matter, the relevant safeguarding procedures shall also apply.

14. Receipt and Acknowledgment of Disclosures

All disclosures received under this Policy should be documented promptly and handled with appropriate care. Where the identity of the reporting person is known and contact is possible, CDSJ should acknowledge receipt within a reasonable time, unless doing so would create risk or compromise confidentiality.

The acknowledgment should not imply that the allegation is proven, but should indicate that the concern has been received and will be assessed.

15. Initial Assessment

All protected disclosures shall be subject to an initial assessment to determine:

- a) whether the concern appears credible or materially significant;
- b) whether the disclosure falls under this Policy or another CDSJ process;
- c) whether urgent protective measures are needed;
- d) whether there is immediate risk to persons, funds, records, or systems;
- e) whether the matter should be referred, escalated, investigated, or otherwise addressed; and
- f) whether donor, governance, legal, or safeguarding reporting obligations may arise.

The initial assessment must be conducted discreetly, objectively, and without prejudging the matter.

16. Referral and Case Routing

Depending on the nature of the concern, a disclosure may be managed under or alongside one or more other CDSJ policies or processes, including:

- a) Anti-Fraud, Corruption and Bribery Policy;
- b) Safeguarding Policy;
- c) Child Protection Policy;
- d) Sexual Harassment Policy;
- e) Grievance and Complaints Handling Policy;
- f) Disciplinary Policy;
- g) Human Resources Policy;
- h) Risk Management and Internal Control Policy; or
- i) any relevant legal, contractual, or donor reporting process.

Referral to another process does not remove the whistleblower protection obligations under this Policy.

17. Protection Measures

Where a person is at risk of retaliation, intimidation, victimisation, or harm because of a disclosure, CDSJ shall take reasonable and proportionate steps to protect them.

Protection measures may include:

- a) restricted disclosure of identity;
- b) changes to reporting lines or communication arrangements;
- c) temporary workplace adjustments;
- d) no-contact instructions where appropriate;
- e) temporary reassignment of duties;
- f) protection from retaliatory disciplinary or management action;
- g) support access through HR, wellness, safeguarding, or leadership structures; and
- h) any other lawful and appropriate protective step.

Protective measures shall be tailored to the circumstances and reviewed as needed.

18. Retaliation Prohibited

Retaliation is strictly prohibited. Retaliation may include:

- a) dismissal, suspension, demotion, or denial of opportunity;
- b) intimidation, threats, harassment, or bullying;
- c) reputational attacks or malicious rumours;
- d) unjustified negative evaluations or disciplinary action;
- e) isolation, exclusion, or hostile treatment;
- f) contract non-renewal or withdrawal of benefits because of reporting;
- g) withholding information or resources necessary for work; or
- h) any other adverse act linked to a protected disclosure.

Retaliation may be direct or indirect, overt or subtle, immediate or delayed.

Any person who retaliates against a whistleblower or reporting person may be subject to serious disciplinary, contractual, governance, or legal consequences.

19. Investigations and Inquiries

Where a disclosure warrants further review, CDSJ shall ensure that an appropriate inquiry or investigation is conducted by a competent and sufficiently independent person or team.

The nature of the inquiry may depend on:

- a) the seriousness of the allegation;
- b) the office or seniority of the person implicated;
- c) the risks involved;
- d) the subject matter of the concern;
- e) donor or legal requirements; and
- f) conflict of interest considerations.

Investigations shall, as appropriate:

- define the scope of inquiry;
- preserve evidence;
- interview relevant persons;
- review documents, systems, and records;
- maintain confidentiality where possible;
- document actions taken and findings made; and
- produce an outcome record or report.

20. Rights and Fair Treatment of Persons Implicated

Persons who are the subject of a disclosure shall be treated fairly and in accordance with due process.

A disclosure is an allegation or concern, not proof of guilt.

CDSJ shall take reasonable care to avoid unnecessary reputational harm, prejudgment, unfair exposure, or misuse of process, while still acting promptly and responsibly on credible concerns.

21. Feedback to Reporting Persons

Where reasonably possible and lawful, CDSJ should provide appropriate feedback to the reporting person on the status or outcome of their disclosure.

Feedback may be limited by:

- a) confidentiality requirements;
- b) legal restrictions;
- c) safeguarding concerns;
- d) employment or disciplinary privacy obligations; or
- e) the need to protect evidence or other persons.

Lack of detailed feedback does not mean that the disclosure has been ignored.

22. Malicious, False, or Reckless Disclosures

- CDSJ will protect good-faith reporters, even where concerns are not ultimately substantiated.
- However, knowingly false, malicious, fabricated, or recklessly dishonest disclosures may amount to misconduct and may result in disciplinary or other appropriate action.
- A disclosure is not malicious merely because it is mistaken, unproven, or difficult to verify.

23. Confidentiality, Records, and Information Handling

- All disclosures, records, case files, and related information shall be handled with appropriate confidentiality, security, and institutional care.
- Access to disclosure-related information shall be limited to persons with a legitimate need to know for purposes of assessment, investigation, protection, oversight, legal compliance, or corrective action.
- Records shall be maintained in accordance with CDSJ's records management and data protection requirements.

24. External Reporting

Nothing in this Policy prevents a person from making a report to a regulator, donor, law enforcement body, child protection authority, court, statutory body, or other competent authority where:

- a) such reporting is required by law;
- b) internal reporting is unsafe or compromised;
- c) urgent public interest or safeguarding concerns arise; or
- d) CDSJ is legally required to make or cooperate with such reporting.

Where possible and safe, internal reporting is encouraged first, but this Policy shall not be interpreted to unlawfully block protected external reporting.

25. Roles and Responsibilities

25.1 Governance Structures: Governance bodies shall support oversight, receive escalated disclosures where appropriate, safeguard institutional integrity, and ensure that reporting systems remain credible and trusted.

25.2 Executive Management: Executive Management shall ensure implementation of this Policy, support safe reporting mechanisms, prevent retaliation, and ensure that serious concerns are assessed and addressed appropriately.

25.3 Designated Focal Points: Any designated whistleblower, ethics, compliance, HR, finance, procurement, or safeguarding focal point receiving a disclosure shall handle it responsibly, confidentially, and in accordance with this Policy and related processes.

25.4 Managers and Supervisors: Managers and supervisors shall not discourage reporting, retaliate against reporters, or suppress concerns. They shall escalate serious disclosures promptly and appropriately.

25.5 Staff and Associated Personnel: All staff and associated personnel shall report serious concerns in good faith, cooperate with legitimate inquiry processes, and refrain from retaliatory or obstructive conduct.

25.6 Partners and Third Parties: Partners, vendors, sub-grantees, and other third parties engaging with CDSJ shall not retaliate against persons who report wrongdoing connected to CDSJ-supported work.

26. Compliance and Enforcement

Compliance with this Policy is mandatory.

Any breach of this Policy, including retaliation, concealment of serious disclosures, deliberate failure to escalate material concerns, obstruction of inquiry, breach of confidentiality, or misuse of whistleblower processes, may result in:

- a) corrective action;
- b) disciplinary action;
- c) withdrawal of authority or role;
- d) contractual consequences;

- e) governance action;
- f) referral to external authorities where required; or
- g) any other lawful and proportionate response.

27. Country Applicability Clause

This Policy is intended to apply across all CDSJ operations and future country offices.

Where mandatory legal requirements in a country of operation require specific whistleblower, labour, anti-corruption, safeguarding, or disclosure-related procedures, CDSJ may issue a country annex, compliance schedule, or implementing procedure.

Such country-specific instruments shall supplement, and not weaken, the core standards established in this Policy, except where adjustment is required by mandatory law.

28. Related Instruments

This Policy shall be read together with:

- the Constitution of CDSJ;
- the CDSJ Policy Framework;
- the Board Governance and Oversight Charter;
- Code of Conduct and Ethics Policy;
- Conflict of Interest Policy;
- Anti-Fraud, Corruption and Bribery Policy;
- Grievance and Complaints Handling Policy;
- Disciplinary Policy;
- Human Resources Policy;
- Safeguarding Policy;
- Child Protection Policy;
- Sexual Harassment Policy;
- Risk Management and Internal Control Policy;
- Data Protection, Privacy, and Confidentiality Policy; and
- any other relevant CDSJ policy or procedure.

29. Monitoring, Review, and Amendment

This Policy shall be monitored as part of CDSJ's broader governance, ethics, compliance, safeguarding, audit, risk management, and institutional integrity systems.

It shall be reviewed at least once every three years, or earlier where required by:

- a) legal or regulatory change;
- b) donor requirement;
- c) institutional growth or country expansion;
- d) repeated reporting failures or retaliation concerns;
- e) serious incident or case management lessons; or
- f) governance, audit, or compliance recommendation.

Any amendment to this Policy shall be approved through the appropriate governance process and recorded in the official Policy Register.

30. Definitions

For purposes of this Policy:

Associated Personnel means consultants, volunteers, interns, fellows, contractors, secondees, and any other person engaged to act for or on behalf of CDSJ.

CDSJ means the Centre for Development in Social Justice.

Protected Disclosure means a report, concern, complaint, or communication made in good faith by a person who reasonably believes that wrongdoing has occurred, is occurring, or may occur in relation to CDSJ.

Reporting Person means any person who makes, attempts to make, or seeks advice about making a disclosure under this Policy.

Retaliation means any adverse action, threat, intimidation, punishment, disadvantage, exclusion, or hostile treatment linked to a protected disclosure or participation in a related process.

Whistleblower means a person who makes a protected disclosure concerning serious wrongdoing affecting CDSJ.

Wrongdoing means conduct that is unlawful, unethical, corrupt, abusive, fraudulent, seriously unsafe, retaliatory, or otherwise materially inconsistent with CDSJ's policies, duties, or legitimate institutional obligations.

31. Approval

Approved by: Adv. Motlatsi J Mofolo

Approving Authority: Director and Boards Ex-Officio

Date of Approval: 10 February 2026

Effective Date: 1st March 2026

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