KARAMOJA TUMAINI NETWORK · KTN

Whistleblowing and Protected Disclosure Policy

Speaking up safely, so wrongdoing never hides

Policy Category Governance Policy · Classification: Public
Adopted by the Board of Directors June 2026
Status Version 1.0 · Effective June 2026 · Next review June 2029

OUR COMMITMENT

Karamoja Tumaini Network commits to hearing the truth, however uncomfortable, and to protecting absolutely the people who tell it. Anyone may disclose suspected wrongdoing, openly, confidentially or anonymously, in any language, through many safe channels, and every disclosure made in good faith will be assessed, investigated where warranted, and acted on.

No one who speaks in good faith will suffer for it: retaliation in any form is gross misconduct, whoever commits it. Concerns about children move immediately under our safeguarding policies. We will keep the records, report to our Board, cooperate with the authorities, and improve this system year on year.

WHY IT MATTERS

Wrongdoing survives on silence. Fraud, abuse and corruption are almost never discovered by audits first; they are seen by an ordinary person who must decide whether it is safe to speak. Tips uncover more fraud than every other method combined. The colleague, volunteer or parent willing to say what they saw is the safety net under every other policy KTN has, and the children this organisation serves are the reason the net must hold.

WHERE IT APPLIES

Every person who works for or with KTN, and anyone outside it, a partner, a supplier, a parent, a stranger, who sees wrongdoing connected to KTN's work. Every office, field location and activity, on duty and off duty where conduct touches KTN's name, regardless of the source of funding.

HOPE · HEAL · EMPOWER

If I speak, will I be safe, and will it matter? The answer here is yes.

WHISTLEBLOWING AND PROTECTED DISCLOSURE POLICY · KARAMOJA TUMAINI NETWORK

Contents

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List of Tables

List of Figures

This policy contains no numbered figures. Its process content is carried in the tables listed above, and in the reporting channel card at Annex B, which is the one item designed to be displayed rather than read.

Policy Approval

This Whistleblowing and Protected Disclosure Policy was considered and approved by the Board of Directors of Karamoja Tumaini Network in June 2026 and takes effect from that date as a governance instrument of the organisation. Compliance with it is mandatory for everyone within the scope set out in Chapter 2. The resolution reference and the signatures below complete the formal record of adoption.

Field	Detail
Policy status	Approved
Approval authority	Board of Directors
Approval date	June 2026
Effective date	June 2026
Version	1.0
Board resolution reference	KTN/BRD/RES/2026/_____

The Board Secretary enters the resolution number from the minutes of the approving meeting before the signed copy is filed.

APPROVAL SIGNATURES

Chairperson, Board of Directors
Karamoja Tumaini Network · June 2026

A Statement of Commitment from the Board

Every policy this Board has adopted, on safeguarding, on money, on conduct, on care, depends in the end on one thing: that a person who sees it broken will say so. Controls can be evaded and training forgotten, but wrongdoing cannot survive an organisation whose people speak and whose leaders listen. That is what this policy builds.

We make a plain promise to anyone, inside KTN or outside it, who discloses suspected wrongdoing in good faith: you will be thanked, you will be protected, and what you report will be acted on. Retaliation against you, in any form, open or subtle, will be treated as gross misconduct whoever commits it. The law of Uganda protects you, and this Board stands behind the law.

We have made sure there is no one this policy cannot reach. Concerns about managers go above them; concerns about the Executive Director come to this Board; concerns about this Board go to the authorities, and we will cooperate. The children of Karamoja are owed an organisation that polices itself; this policy is how we keep that promise.

Chairperson, Board of Directors

Karamoja Tumaini Network

Adopted by resolution of the Board of Directors, June 2026.

Document Control

Field	Detail
Policy title	Whistleblowing and Protected Disclosure Policy
Registered name	Karamoja Tumaini Network Limited, a company limited by guarantee without share capital, Reg. No. 80034272074698, incorporated on 1 July 2025 under the Companies Act, 2012 (Cap. 106); permitted to operate as a Non-Governmental Organisation by the National Bureau for Non-Governmental Organisations under permit number INDP000745-NB, file number MIA/NB/2026/06/7454
Version	1.0
Status	Approved and adopted by the Board of Directors
Approval date	June 2026
Effective date	June 2026
Policy owner	Karamoja Tumaini Network, acting through its Board of Directors
Policy custodian	The designated Whistleblowing Custodian, on behalf of the Executive Director
Applies to	All board members, staff, volunteers, interns, peer educators, community workers, consultants and contractors, and all external persons who disclose wrongdoing connected to KTN; at every KTN office and field location, on every source of funding
Reads alongside	The Finance and Anti-Fraud Policy; the Child Safeguarding Policy; the PSEA Policy; the Workplace Harassment Policy; the Complaints and Community Feedback Procedure; the Code of Conduct; the Conflict of Interest Policy; the Human Resources and People Management Policy; and the Data Protection and Privacy Policy
Definitions	Key terms are defined in Section 2.5
Review cycle	Three years, and earlier where law, cases, donor requirements or the indicators require it
Next scheduled review	June 2029
Classification	Public
Languages	English; the channel card and community materials also in Nga'Karamojong

Version Control Register

Version	Date	Approved by	Description of change
1.0	June 2026	Board of Directors	First issue in the Strategic Plan design, upgrading and superseding the earlier draft Whistleblowing Policy

Amendment History Register

No.	Date	Section(s) affected	Summary and approval reference
1	16 August 2026	Front matter; Contents; Section 8.2; new Section 8.5; annex titles	Presentation and completeness update. Full front matter added (List of Tables, List of Figures, Distribution List, Contact Information, Acronyms and Abbreviations, Executive Summary); Contents rebuilt as one live field listing sub-headings and annexes; Section 8.2 retitled and its retention sentence moved to the new Section 8.5, Records, Audit Trail and Retention; annex titles renumbered Annex A to Annex E; Chairperson's signature applied. Approved by the Executive Director as an administrative update under Section 9.5.

Distribution List

Recipient	Format	Date issued
Board of Directors	Electronic copy and one signed print copy for the corporate record	June 2026
Executive Director and all staff	Electronic copy; included in the staff induction pack, with the channel card at Annex B	June 2026

Volunteers, interns, peer educators and community workers	Electronic copy on request; the channel card at Annex B issued and explained at induction	June 2026
Partners, suppliers and contractors	This policy's reporting clauses and the channel card issued with their agreements	With each agreement
Communities KTN works with	The channel card at Annex B, displayed at every office and outreach site, in English and Nga'Karamojong	From adoption
Donors	Full copy in due diligence and assessment packs	On request
Public	Published on the KTN website, www.karamojatumaini.org	From adoption

The policy custodian keeps this list current. The authoritative version of this policy is the signed copy held by the custodian.

Contact Information

Field	Detail
Policy owner	Karamoja Tumaini Network
Policy custodian	The designated Whistleblowing Custodian, on behalf of the Executive Director
Make a disclosure	Any manager you trust, or the Whistleblowing Custodian directly, in person, by phone, SMS or email, in Nga'Karamojong or English (Section 5.1 and Annex B)
Disclose without giving your name	A letter or unsigned note to the custodian, or the locked boxes at the Kampala and Napak offices (Section 5.2)
A disclosure about the Executive Director or a Board member	The Chairperson of the Finance and Audit Sub-Committee, or the Board Chairperson, bypassing management entirely (Sections 5.1 and 7.3)
A child at risk	The Designated Safeguarding Lead, immediately, under the Child Safeguarding Policy; protection moves before process (Section 6.2)
Disclose outside KTN, protected by law	The Inspectorate of Government, the Uganda Police or the Directorate of Public Prosecutions, and any donor hotline provided for in an agreement (Section 5.4)
Kampala office	Da Joy House, Room JS05A, Waliggo Road, Komamboga, P.O. Box 10066, Kampala
Napak office	C/o Matany Trading Centre, Matany Town Council, Napak District
Email	info@karamojatumaini.org
Website	www.karamojatumaini.org

Acronyms and Abbreviations

Acronym	Meaning
ACFE	Association of Certified Fraud Examiners
CHS	Core Humanitarian Standard on Quality and Accountability
CPC	Child Protection Committee
DPA	Data Protection and Privacy Act, 2019 (Cap. 97)
DPP	Directorate of Public Prosecutions
DSL	Designated Safeguarding Lead, as named in the Child Safeguarding Policy
ED	Executive Director
IASC	Inter-Agency Standing Committee
IG	Inspectorate of Government
ISO	International Organization for Standardization
KTN	Karamoja Tumaini Network
PSEA	Protection from Sexual Exploitation and Abuse
SHIELD	Safeguard, Heal, Integrate, Empower, Lead, Data: the framework of the KTN Strategic Plan
WPA	Whistleblowers Protection Act, 2010

Key terms used in this policy are defined in Section 2.5.

Executive Summary

This is Karamoja Tumaini Network's authoritative framework for how suspected wrongdoing is disclosed, protected and acted on. It applies to every board member and member of staff, and to all volunteers, interns, peer educators, community workers, consultants and contractors, and to any community member, partner or supplier who brings a concern to KTN. It is the safe channel that the rest of the policy suite points to: the Finance and Anti-Fraud Policy routes financial concerns here, the Child Safeguarding and PSEA Policies take precedence for immediate response to harm, the Workplace Harassment Policy handles grievances between colleagues, and the Complaints and Community Feedback Procedure receives general complaints from communities.

KTN's work rests on trust that cannot be audited into existence: of families who hand over their children's futures, of donors who fund work they cannot watch, and of communities that have been failed before. Wrongdoing almost never announces itself. It is seen first by an ordinary person, and the Association of Certified Fraud Examiners finds year after year that tips uncover more of it than audits, reviews and surveillance combined. KTN's strongest control is therefore a person willing to speak, and the purpose of this policy is to make that person safe.

The policy does five things. First, it defines what counts as wrongdoing and what belongs under another policy, so that nothing is turned away and nothing is handled in the wrong place. Second, it opens six routes for a disclosure, including one to the Board that bypasses management entirely, and one outside KTN that the Whistleblowers Protection Act, 2010 protects. Third, it guarantees protection: no detriment of any kind for a good-faith disclosure, retaliation treated as gross misconduct, and anonymity honoured absolutely. Fourth, it fixes timelines that can be measured, from acknowledgement within two working days to a decision within ten working days of findings. Fifth, it makes the system accountable through a confidential register, a documented audit trail, stated retention periods and twice-yearly reporting to the Board.

The policy is proportionate to what KTN is: a young, Karamojong-led organisation working in two offices and the districts between them. Its controls are ones KTN can operate at its current size and grow into, and its measure is not its length but a single question asked in a kraal, a corridor office or a Kampala street at night: if I speak, will I be safe, and will it change anything? This policy exists so that the answer is yes to both.

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CHAPTER ONE

INTRODUCTION

Wrongdoing survives on silence. Why the person who speaks up is protecting every child KTN serves.

1 Introduction

1.1 Why this policy exists

Karamoja Tumaini Network Limited is a Karamojong-led, child-focused organisation incorporated in Uganda as a company limited by guarantee. Its work depends on trust: of families who hand over their children's futures, of donors who fund work they cannot watch, and of communities that have been failed before. Wrongdoing, fraud, abuse, exploitation, corruption, cover-up, destroys that trust, and it almost never announces itself. It is seen first by an ordinary person: a colleague, a volunteer, a driver, a parent, who then faces the oldest question in any organisation: is it safe to say something?

This policy exists to make the answer yes. It gives every person a safe, clear way to disclose suspected wrongdoing, inside KTN or, where necessary, to the authorities; it guarantees protection from retaliation for anyone who speaks in good faith; and it commits KTN to act on what it hears, fairly and quickly. The Association of Certified Fraud Examiners finds year after year that tips uncover more fraud than audits, reviews and surveillance combined. The person most likely to protect KTN's mission is the one this policy protects.

> *The incident KTN fears is the one nobody reports.*

1.2 How this policy reads with the rest of the suite

This policy is the safe channel that every other KTN policy points to. The Finance and Anti-Fraud Policy routes financial concerns here; the Child Safeguarding and PSEA Policies govern harm to children and sexual exploitation, and always take precedence for immediate response; the Workplace Harassment Policy handles personal grievances between colleagues; the Complaints and Community Feedback Procedure receives general complaints from communities. Where a matter arrives through the wrong door, KTN moves it to the right one without penalising the person who knocked.

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CHAPTER TWO

PURPOSE, SCOPE AND DEFINITIONS

What this policy is for, who it protects, and the words it uses precisely.

2 Purpose, Scope and Definitions

2.1 Purpose

This policy exists to:

1. give every person a safe, accessible and confidential way to disclose suspected wrongdoing connected to KTN;
2. protect anyone who makes a disclosure in good faith from retaliation of any kind, as the Whistleblowers Protection Act, 2010 requires and beyond it;
3. ensure every disclosure is assessed, investigated where warranted, and acted on, fairly, confidentially and on fixed timelines;
4. define who handles disclosures, including when senior leaders are themselves the subject;
5. align KTN's practice with Ugandan law and international good practice, so that donors, regulators and communities can rely on it; and
6. build a culture where speaking up is ordinary, safe and valued.

2.2 Who and what this policy covers

This policy applies to every member of the Board of Directors and every member of staff, and to all volunteers, peer educators, community workers, interns, consultants and contractors engaged by KTN. It also protects external whistleblowers: partner personnel, suppliers, community members and any other person who discloses suspected wrongdoing connected to KTN. It applies at every office and field location, to conduct on duty and off duty where it touches KTN's work or name, and regardless of the source of funding.

2.3 What counts as wrongdoing

A disclosure under this policy concerns suspected wrongdoing connected to KTN, including: fraud, theft, bribery, corruption or misuse of funds or property; abuse, neglect or exploitation of a child or vulnerable adult; sexual exploitation, abuse or harassment; danger to health, safety or the environment; breach of Ugandan law or of KTN's policies; abuse of position or authority; victimisation of a whistleblower; and deliberate concealment of any of these. It is not necessary to be right: a reasonable, honest belief is enough.

2.4 What this policy is not for

Personal employment grievances, terms and conditions, interpersonal conflict, performance disagreements, belong under the Human Resources and People Management Policy and the Workplace Harassment Policy, which are built for them. General complaints about KTN's services belong under the Complaints and Community Feedback Procedure. Using this policy knowingly to make a false accusation is misconduct (Section 4.4). A matter raised through the wrong channel is redirected, never punished.

2.5 Definitions

Term	Meaning
Whistleblower	A person who discloses suspected wrongdoing connected to KTN, in good faith, under this policy or the Whistleblowers Protection Act, 2010.
Disclosure	The act of reporting suspected wrongdoing; "protected disclosure" means one made in good faith to an authorised person or body, attracting legal protection.

Good faith	An honest and reasonable belief that the information disclosed is true. Being mistaken does not defeat good faith; knowingly lying does.
Retaliation (victimisation)	Any detriment inflicted because of a disclosure: dismissal, demotion, harassment, isolation, threats, withheld opportunities, or pressure to withdraw.
Authorised officer	A person or institution to whom a protected disclosure may lawfully be made under the Act, including an employer, the Inspectorate of Government, the Police, the Directorate of Public Prosecutions and other listed bodies.
Subject	The person or entity a disclosure concerns, entitled to fairness and confidentiality while the matter is examined.
Anonymous disclosure	A disclosure made without the reporter's name. KTN accepts and assesses these on their evidence.

Table 1. Definitions of key terms. Annex E holds a plain-language glossary.

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CHAPTER THREE

POLICY STATEMENT, PRINCIPLES AND COMMITMENTS

The guarantee KTN makes to anyone who speaks up in good faith.

3 Policy Statement, Principles and Commitments

3.1 The policy statement

POLICY STATEMENT

Karamoja Tumaini Network commits to hearing the truth, however uncomfortable, and to protecting absolutely the people who tell it. Anyone may disclose suspected wrongdoing connected to KTN, openly, confidentially or anonymously, in any language, through any channel in this policy. Every disclosure made in good faith will be received with thanks, assessed promptly, investigated fairly where warranted, and acted on. No one who speaks in good faith will suffer for it: retaliation in any form is gross misconduct, whoever commits it. Concerns involving children or sexual exploitation move immediately under our safeguarding policies. We will keep the records, report to our Board, cooperate with the authorities, and improve this system year on year.

3.2 Principles

Safety first

The reporter's safety, and the safety of any child or person at risk, comes before every procedural step. Where a disclosure reveals immediate danger, protection acts first and paperwork follows.

Confidentiality

The identity of a whistleblower, and of the subject, is known only to those who must know for the matter to be handled. Confidentiality is kept from receipt to closure and after it.

Fairness to all

An allegation is not a finding. The subject of a disclosure is presumed innocent, informed and heard at the right moment, and protected from rumour while facts are established.

Independence

No one assesses or investigates a matter in which they have an interest, and disclosures about the powerful travel routes the powerful do not control.

Action and honesty

A disclosure changes something: an investigation, a fixed control, a referral, or a reasoned decision to close. The reporter learns the outcome to the extent confidentiality allows.

3.3 Commitments

1. KTN shall maintain at least three always-open reporting channels, published at every office and usable in Nga'Karamojong and English, in writing or by voice, named or anonymous;
2. KTN shall acknowledge disclosures within two working days where the reporter can be reached, and complete initial assessment within five;
3. KTN shall protect whistleblowers from retaliation, treat any retaliation as gross misconduct, and support any lawful claim a whistleblower makes under the Act, including its reward provisions;
4. KTN shall route safeguarding and PSEA matters immediately under those policies, and refer criminal matters to the authorities as the law requires;
5. KTN shall provide safe routes for disclosures concerning the Executive Director or Board members, handled by people they do not control;

6. KTN shall keep confidential records of every disclosure and its handling, and report the pattern to the Board twice a year; and
7. KTN shall train every person covered by this policy on how to disclose and how to receive a disclosure, at induction and annually.

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CHAPTER FOUR

LEGAL AND STANDARDS FRAMEWORK

The Whistleblowers Protection Act, the laws around it, and the standards beyond them.

4 Legal and Standards Framework

4.1 Ugandan law

Instrument	What it provides	Where addressed
Whistleblowers Protection Act, 2010	Protects any person who, in good faith, discloses impropriety to an authorised officer; prohibits victimisation; provides remedies, confidentiality duties, and a reward of five percent of funds recovered through a disclosure.	Whole policy
Anti-Corruption Act, 2009 (Cap. 116) (as amended, 2015)	Criminalises the corruption, embezzlement and abuse of office that disclosures most often concern; provides for recovery and confiscation.	Chapters 2, 7
Inspectorate of Government Act and the Inspectorate of Government	The IG receives and investigates disclosures of corruption and maladministration; an external authorised route for KTN whistleblowers.	Section 5.4
Children Act, Cap. 59 (as amended), and related child protection law	Mandatory protection response where a child is at risk; overrides ordinary process timelines.	Section 6.2
Employment Act, 2006 (Cap. 226)	Unfair dismissal and disciplinary standards that protect whistleblowing employees and govern consequences for retaliators.	Chapter 7
Data Protection and Privacy Act, 2019 (Cap. 97)	Lawful, secure handling of the personal data in disclosure records.	Section 8.3

Table 2. Core legal register. The live register with evidence held is maintained by the policy custodian.

4.2 International standards and donor expectations

KTN benchmarks this policy against the standards its donors and peers apply: the Core Humanitarian Standard (2024 revision), which requires safe, accessible and responsive complaint and whistleblowing channels; the IASC Six Core Principles and minimum operating standards on protection from sexual exploitation and abuse; ISO 37002 guidance on whistleblowing management systems, applied proportionately to KTN's size; and the whistleblower protection clauses that EU, UN, US and foundation grant agreements carry. Where a donor's requirements are stricter than this policy, the stricter rule applies to that grant.

4.3 The reward and the protection

The Whistleblowers Protection Act, 2010 does two things this policy makes practical. It protects: a person who discloses in good faith commits no breach of duty or confidence, and victimising them is unlawful. And it rewards: a whistleblower whose disclosure leads to the recovery of money is entitled to five percent of the net amount recovered. KTN informs whistleblowers of these rights and supports any lawful claim; the reward belongs to the whistleblower, never to KTN.

4.4 False accusations

Protection covers honest mistakes; it does not cover lies. A person who knowingly makes a false disclosure, to harm a colleague, settle a score or manufacture leverage, commits misconduct handled under the Human Resources and People Management Policy, and where the fabrication is criminal, KTN may refer it. The test is knowledge, not outcome: an unproven disclosure made in good faith carries full protection.

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CHAPTER FIVE

REPORTING CHANNELS

Many safe doors, always open: how and where to disclose.

5 Reporting Channels

5.1 The channels

Channel	How it works	Best for
Line management	Speak to or write to any manager you trust, up to the Executive Director.	Most concerns, fastest routing
Designated custodian	The policy custodian receives disclosures directly, in person, by phone, SMS or email, in Nga'Karamojong or English.	Confidential concerns; guidance on the process
Written or anonymous	A letter or unsigned note to the custodian or into the locked suggestion boxes at each office; an anonymous call or message.	Reporters who need distance
Board route	Directly to the Chairperson of the Finance and Audit Sub-Committee or the Board Chairperson, bypassing management entirely.	Concerns involving senior staff or the Executive Director
Community channels	The Complaints and Community Feedback Procedure's channels; any disclosure arriving there is routed here, protected.	Community members and partners
External authorised officers	The Inspectorate of Government, the Uganda Police, the DPP and other bodies listed in the Act; and donors' own hotlines where agreements provide them.	Where internal routes are unsafe or have failed

Table 3. Reporting channels. Contact details are published on the channel card at Annex B, displayed at every office and given at induction.

5.2 Anonymity and confidentiality

A named disclosure is easier to investigate and to protect, and names are kept confidential. But anonymity is honoured absolutely: KTN accepts anonymous disclosures, assesses them on their evidence, never attempts to unmask a reporter, and treats attempts by anyone else to do so as retaliation. Where an anonymous reporter provides a safe contact route, KTN uses it only for clarification and feedback.

5.3 Help to disclose

A disclosure does not need to be polished. It can be spoken, in any language, and the receiver will write it down and read it back. It should say, as far as the reporter knows: what happened, who was involved, when and where, whether it is continuing, and what evidence exists. The form at Annex A guides receivers; reporters are never required to use it.

5.4 Going outside KTN

KTN prefers to hear it first, because it can act fastest. But the law protects disclosure to any authorised officer, and this policy honours that: a person who goes to the Inspectorate of Government, the Police or another lawful body, first or at any point, keeps every protection in this policy. Where KTN's own channels have failed a reporter, going outside is not disloyalty; it is the system working.

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CHAPTER SIX

PROTECTION GUARANTEES

What protection means in practice, from the moment a disclosure is made.

6 Protection Guarantees

6.1 No retaliation, ever

No one who discloses in good faith will suffer any detriment for it: not dismissal, demotion, transfer against interest, denied opportunity, harassment, isolation, threats, or the quiet punishments that never appear in writing. This guarantee binds everyone, from the Board down, and covers those who assist a whistleblower or participate in an investigation. Retaliation is gross misconduct leading to dismissal, whoever commits it, and where it breaches the Act it is also unlawful.

6.2 Protection of people at risk

Where a disclosure reveals immediate risk, to the reporter, to a child, to anyone, protection moves before process: safeguarding response under the Child Safeguarding and PSEA Policies, safety measures under the Health, Safety and Security Policy, and referral to authorities where the law requires. A reporter who fears for their safety says so, and the assessment of that fear is generous.

6.3 Support for the whistleblower

Speaking up is heavy. KTN keeps the reporter informed of progress and outcome to the extent confidentiality allows, provides access to wellbeing support under the Human Resources and People Management Policy, adjusts work arrangements where contact with the subject would be harmful, and monitors for subtle retaliation after closure, not just before it. A whistleblower who feels retaliated against reports it through any channel in Chapter 5, and that report is itself a protected disclosure.

6.4 Fairness to the subject

Protection of the reporter never becomes persecution of the accused. The subject of a disclosure is told of the allegation at the point the investigation requires, hears the substance, answers it, and is protected from rumour and prejudgement. Suspension, where used, is on full pay, protective not punitive. An unfounded allegation ends with the subject's name clean and the file saying so.

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CHAPTER SEVEN

HANDLING AND INVESTIGATION

From receipt to closure on fixed timelines: assess, investigate, decide, act, learn.

7 Handling and Investigation

7.1 The path of a disclosure

Stage	What happens	Who leads	When
Receive	The disclosure is recorded on the form at Annex A, confidentially; immediate risks acted on; safeguarding matters routed at once.	Receiver / custodian	Same day
Acknowledge	The reporter is thanked and told what happens next, where they can be reached.	Custodian	Within 2 working days
Assess	Is it credible? Is it this policy or another? What is at risk? Who is independent enough to investigate? Authorities or donors to notify now?	Custodian with ED, or Board route	Within 5 working days
Investigate	A fair, confidential investigation by a person or panel independent of the matter; evidence gathered; the subject heard; findings written.	Appointed investigator	Normally within 30 days
Decide and act	Findings to the ED or, for senior subjects, the Board; discipline, recovery, referral, control fixes as warranted.	ED or Board	Within 10 working days of findings
Close and learn	Reporter informed of the outcome in substance; records completed; the control or culture gap that allowed the wrong is fixed; lessons to the Board.	Custodian / ED	At closure

Table 4. The path of a disclosure. Where a stage cannot meet its timeline, the reporter is told why and given a new date.

7.2 Investigations done properly

Investigations under this policy follow the same discipline as the Finance and Anti-Fraud Policy's: evidence preserved before anything else, no tip-offs, interviews recorded accurately, criminal-standard care where prosecution may follow, and conclusions drawn from facts, not seniority. Investigators are chosen for independence and competence; external investigators are engaged where the matter exceeds internal capacity or independence.

7.3 Special cases

Where a disclosure concerns the Executive Director, every role in Table 4 passes to the Board through the Chairperson of the Finance and Audit Sub-Committee. Where it concerns a Board member, the Board Chairperson leads; where the Chairperson, the remaining Board designates. Where it concerns the custodian, any channel in Chapter 5 routes around them. Sexual exploitation and abuse follows the PSEA Policy without exception; harm to a child follows the Child Safeguarding Policy's response first and always.

7.4 Referral to authorities and donors

Criminal conduct is reported to the Uganda Police or the relevant authority; corruption matters may be referred to the Inspectorate of Government; and donors are notified exactly as their agreements require. Internal process never delays a legally required report, and KTN never trades silence for repayment.

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CHAPTER EIGHT

RECORDS, GOVERNANCE AND ACCOUNTABILITY

Who owns this system, the records it keeps, and how the Board watches it work.

8 Records, Governance and Accountability

8.1 Roles

Role	Responsibility
Board of Directors	Owns the policy; receives twice-yearly reports and immediate notice of grave matters; handles disclosures concerning the ED and Board members.
Finance and Audit Sub-Committee	Oversees the system's health; reviews patterns, timeliness and retaliation monitoring; meets the custodian without management where needed.
Executive Director	Accountable for implementation: channels open, custodian appointed in writing, training delivered, actions completed, culture led from the front.
Policy custodian	Receives and logs disclosures, runs acknowledgement and assessment, coordinates investigations, keeps records, supports reporters, prepares Board reports.
Managers	Receive disclosures safely, route them the same day, protect reporters in their teams, and never investigate their own matters.
Everyone	Discloses wrongdoing they see, keeps confidences, and never retaliates.

Table 5. Roles and responsibilities. The custodian appointment is made in writing and published with the channel card.

8.2 The confidential register

Every disclosure is logged in a confidential register: date, channel, substance, assessment, investigation, outcome, feedback given, and the control fix that followed. Records are kept securely, separate from personnel files, and accessible only to those who must know for the matter to be handled. The register template is Annex C, and the audit trail, retention periods and disposal rule that govern it are set out in Section 8.5.

8.3 Data protection

Disclosure records are among the most sensitive data KTN holds. They are handled under the Data Protection and Privacy Act, 2019 (Cap. 97): collected for this lawful purpose, minimised, secured, and never disclosed beyond need. A subject's data rights are honoured in ways that never expose a reporter.

8.4 Monitoring and reporting

Indicator	Frequency	Owner
Disclosures received, by channel and category	Twice yearly to Board	Custodian
% acknowledged within 2 working days; % assessed within 5	Twice yearly	Custodian
% of investigations completed within 30 days	Twice yearly	ED
Retaliation reports received and their outcomes	Twice yearly, and immediately if any	Custodian / Board
Training coverage at induction and refresher	Annual	ED

Control and culture fixes completed from closed cases	Twice yearly	ED

Table 6. Core indicators. A year with zero disclosures is examined as a warning sign, not celebrated as a clean sheet.

8.5 Records, Audit Trail and Retention

A policy that cannot be audited cannot be relied on. Every step this policy requires leaves a record, made at the time, protected from alteration, and disposed of on a schedule rather than at anyone's discretion. This section sets the audit trail, the retention periods and the disposal rule that apply to everything done under this policy.

The audit trail

Recorded when it happens. Every disclosure is entered on the form at Annex A and given a case reference in the register at Annex C at the moment it is received, whether or not it proceeds. No disclosure exists only in a person's memory, a private message or a notebook.

Every decision, with its reason. Each decision in the Table 4 process is recorded with its date, the person who took it and the reason for it. That includes a decision not to investigate and a decision not to refer, which are the two an auditor asks about first.

One controlled register. Disclosure records are held in the single register maintained by the custodian, kept separate from personnel and programme files, with access limited to those who must know for the matter to be handled.

No silent edits. Records are not altered after the fact. A correction is made as a dated addition that leaves the original entry legible, so that what was known, and when, can be reconstructed.

Systems keep their own log. Where disclosure information is held electronically, the system records who opened, added to or changed each record and when. That access log is retained and reviewed under this section in the same way as the records themselves.

Retention periods

The periods below are minimums. Where a donor agreement, an open investigation, a police or court process, or a direction of the Board requires a record to be kept longer, the longer period applies. Nothing is destroyed while a matter it relates to is live.

Record	Minimum retention	Held by
Disclosure case file where the allegation was substantiated	10 years from closure	Whistleblowing Custodian
Disclosure case file closed without investigation, or not substantiated	7 years from closure	Whistleblowing Custodian
Disclosure case file where a child was at risk	On the Child Safeguarding and PSEA schedule, which is longer and prevails	Designated Safeguarding Lead
Reports of retaliation and the record of their outcome	10 years from closure	Whistleblowing Custodian
Investigation evidence, interview notes and the written findings	With the case file they belong to	Whistleblowing Custodian
Referrals to the authorities or to a donor, and the correspondence that followed	10 years from the referral	Executive Director

The confidential disclosure register at Annex C	Permanent	Whistleblowing Custodian
Training registers and induction records for this policy	7 years	Executive Director
System access logs for the register	12 months, with the last 3 months immediately retrievable	Executive Director
Twice-yearly Board reports and anonymised statistics	Permanent	Board Secretary

Table 7. Minimum retention periods. The periods are proposals until the Board adopts them, and are read with the Records Management and Retention Policy where the two meet.

Protection, review and disposal

Protected while held. Paper records are held under lock by the custodian; electronic records are held in the controlled register with access by named role. Disclosure records are never filed with personnel records, and never sent by open email.

Reviewed once a year. The custodian reviews the register annually against this schedule, lists what has fallen due for disposal, and obtains the Executive Director's written approval before anything is destroyed.

Disposed of so it cannot be recovered. Paper is shredded and electronic records are deleted from live systems and from backups on their next cycle. Each disposal is logged with the date, what was destroyed, and who authorised it, and that log is itself kept permanently.

9

CHAPTER NINE

CULTURE, IMPLEMENTATION, REVIEW AND CONCLUSION

Making speaking up ordinary: culture, training, the first year, and what all of it is for.

9 Culture, Implementation, Review and Conclusion

9.1 Training

Every person covered by this policy learns it at induction and in an annual refresher: what counts as wrongdoing, every channel, the protection guarantees, and how to receive a disclosure well, because the first response a reporter meets decides whether the next person ever speaks. Managers and the custodian receive deeper training on handling, confidentiality and investigation basics. Training is delivered in plain language, and in Nga'Karamojong where that is what lands.

9.2 Publication and awareness

The channel card at Annex B is displayed at every office and outreach site, included in induction packs, written into partner and supplier agreements, and published on www.karamojatumaini.org. Communities are told, through the Complaints and Community Feedback Procedure's channels, that concerns about KTN's own people are welcome and protected.

9.3 Leadership

Culture is set by what leaders do when the news is bad. KTN's leaders thank reporters publicly in principle and protect them absolutely in practice, treat every disclosure as a gift of early warning, and never, by joke, sigh or delay, teach people that silence is safer. The Board watches the leaders too: that is why the Board route exists.

9.4 The first year

Action	Lead	By	Done when
Appoint the custodian in writing; open the confidential register; publish the channel card at both offices	ED	Q1	Card displayed; register open
Train all staff, volunteers and Board; brief partners and suppliers	ED / custodian	Q2	Training records
Extend community awareness through CPC and complaints channels	Custodian / field teams	Q3	Sessions delivered
First twice-yearly report to the Board; test the Board route; fix gaps	Custodian / Board	Q4	Report received

Table 8. One-year implementation plan.

9.5 Review and updates

This policy is reviewed every three years, with the next scheduled review by June 2029, and earlier where the law changes, a case exposes a weakness, a donor requires more, or the indicators show the system failing the people it protects. The Board approves every amendment, the Amendment History Register records it, and staff are briefed on what changed and why.

9.6 Conclusion

Every policy in KTN's suite depends on this one. Controls fail, screening misses, training fades; the safety net under all of it is a person willing to say what they saw, and an organisation worthy of hearing it. KTN chooses to be that organisation: many safe doors, absolute protection, honest action, and gratitude to the people who keep the mission clean.

The measure of this policy is not its pages but a single question asked in a kraal, a corridor office or a Kampala street at night: if I speak, will I be safe, and will it matter? Everything in this document exists so the answer, every time, is yes.

A

ANNEXES A TO E

ANNEXES

The working tools: the disclosure form, the channel card, the register, references and glossary.

10 Annexes

Annex A: Disclosure Report Form

Used by receivers to record a disclosure, spoken or written; reporters are never required to complete it themselves. Marked confidential and passed to the custodian the same day.

Field	Entry
Date and time received; received by; channel	
Reporter (name and safe contact, or "anonymous")	
What happened (facts as reported, in the reporter's words)	
Who is involved; when and where; is it continuing?	
Evidence identified (documents, records, witnesses)	
Immediate risks and actions taken (safeguarding routed?)	
Acknowledged on; assessment completed on	
Routed to (investigation / other policy / referral)	

Table 9. Disclosure report form.

Annex B: Reporting Channel Card

Displayed at every office and outreach site, and given at induction. The custodian keeps the contact details current; the card is available in English and Nga'Karamojong.

If you have seen or suspect wrongdoing	You can
Speak to any manager you trust	They must route it safely the same day
Contact the policy custodian	[name] · [phone / SMS] · [email]
Write, unsigned if you wish	Locked boxes at the Kampala and Napak offices
Go above everyone at KTN	Board Chairperson or Finance and Audit Sub-Committee Chairperson: [contacts]
Go outside KTN, protected by law	Inspectorate of Government · Uganda Police · DPP
A child in danger?	Child Safeguarding channels, immediately: [contacts]

Table 10. Reporting channel card. You will be thanked, protected and answered.

Annex C: Confidential Disclosure Register

Ref.	Received / channel	Category and summary	Status / timelines met	Outcome and fix

Table 11. Confidential disclosure register, held by the custodian, reported to the Board twice yearly.

Annex D: Key References

- Whistleblowers Protection Act, 2010.
- Anti-Corruption Act, 2009 (Cap. 116), and the Anti-Corruption (Amendment) Act, 2015.
- Inspectorate of Government Act, and the mandate of the Inspectorate of Government.
- Employment Act, 2006 (Cap. 226); Children Act, Cap. 59, as amended.
- Data Protection and Privacy Act, 2019 (Cap. 97), and Regulations, 2021.
- Core Humanitarian Standard on Quality and Accountability, 2024 revision.
- IASC, Six Core Principles Relating to Sexual Exploitation and Abuse.
- ISO 37002:2021, Whistleblowing management systems (guidance benchmark).
- ACFE, Occupational Fraud 2024: A Report to the Nations.
- KTN Strategic Plan 2026 to 2030 and the KTN governance policy suite.

Annex E: Glossary

Plain-language meanings for induction and community use.

Disclosure: telling someone with authority about suspected wrongdoing.

Good faith: honestly believing what you report, even if it turns out wrong.

Retaliation: punishing someone, openly or quietly, for speaking up.

Custodian: the named person who receives and manages disclosures.

Subject: the person a report is about, who is treated fairly.

Anonymous: giving information without giving your name.

Authorised officer: a person or body the law allows you to report to, inside or outside KTN.

Tumaini: Swahili for hope, the name and the point of the organisation.

SHIELDING PASTORALIST CHILDREN · BUILDING FUTURES · LEADING CHANGE

Behind every number is a child with a name.

The cost of speaking up should never fall on the person who spoke. This policy moves that cost onto KTN, where it belongs, and commits the organisation to acting on what it would very often rather not hear.

Karamoja Tumaini Network

Hope · Heal · Empower

info@karamojatumaini.org · www.karamojatumaini.org

WHISTLEBLOWING AND PROTECTED DISCLOSURE POLICY · VERSION 1.0 · EFFECTIVE JUNE 2026