



REPRODUCTIVE CHOICES

Speaking Up Policy

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If you have a concern, you must:

- raise it with your line manager; or
- raise it with your Country Director (in the case of country programmes) or Finance Director (in the case of support offices); or
- use the external, confidential speaking up service which is independent of MSIAP. The speaking up service can be accessed by:
 - telephone, using the telephone number for your country that is listed in **Appendix 1** to this Policy;
 - webmail: www.safecall.co.uk/report; or
 - email: speakingup@safecall.co.uk.

Introduction

This Policy is divided into ten sections and two Appendices:

1. Why Speak Up?
2. Aim of the Policy
3. Scope of the Policy
4. Who can Raise Concerns?
5. Raising Awareness
6. What Should be Reported?
7. Protecting Those who Speak Up
8. How to Raise Concerns
9. What Happens After you Raise Concerns?
10. Monitoring and Review

Appendix 1 contains the confidential, external and independent speaking up service telephone number for each country programme and support office.

Appendix 2 contains a page of case-studies which illustrate the sorts of malpractice that may arise.

1. Why Speak Up?

- 1.1. MSIAP is committed to putting its clients first and continually delivering excellence. However, like all organisations, we face the risk of our activities going wrong from time to time and of unknowingly harbouring malpractice. As “One MSI”, we need to work together to identify situations where this is happening and to rectify them as quickly as possible. Only by doing this can we improve.
- 1.2. MSIAP People (as defined in section 4 below) are often the first to realise that there may be something going wrong. We therefore encourage you to speak to us if you have genuine concerns about any behaviour in the workplace or how we are achieving our mission. By raising such concerns, you will be making a valuable contribution to our reputation and success. You will be helping us to serve our clients better, and showing the courage and integrity that are central to MSI’s values.

- 1.3. If you are raising a concern, you should read this Policy. It explains:
- The type of concern that must be raised.
 - How to raise a concern.
 - How you will be protected against the risk of victimisation and harassment
 - What will be done when you raise a concern.

2. Aim of the Policy

- 2.1. This Policy aims to:
- Encourage you to feel confident about raising concerns at the earliest opportunity
 - Provide you with a clear procedure for raising your concerns
 - Define a procedure to ensure that you receive a response to your concerns
 - Reassure you that you will be protected from possible reprisals or victimisation where you have raised genuine concerns.

3. Scope of the Policy

- 3.1. This Policy is intended to enable those who become aware of **actual or potential wrongdoing or malpractice in MSIAP or its entities** to raise their concerns at the earliest opportunity so that they can be properly investigated. See **Appendix 2** to this Policy for examples.
- 3.2. **This Policy does not cover human resources issues**, such as concerns about performance appraisals, promotion, contract renewal and salary. If you have these type of concerns, you should raise them under existing grievance procedures (in the case of employees) or under the contract which governs your relationship with MSIAP/its entities (in the case of contractors and franchisees), rather than under this Policy.
- 3.3. **This Policy should be seen as part of a group of policies** which deal with the welfare of all who come into contact with MSIAP, including our staff, our clients, our partners, and the communities in which we work with.

4. Who can Raise Concerns?

- 4.1. This Policy applies to all persons in MSIAP, including all employees, contractors, MS Ladies, trainees, volunteers, sessional workers, and agency staff. It also applies to social franchisees and other business partners (for example, suppliers) and to clients of MSIAP and its entities.

This Policy applies to all persons in MSIAP funded projects, including MSIAP people that provide services on behalf of MSIAP.

This Policy applies during and outside of working hours, whenever someone can be considered to represent the organisation, in line with MSIAP's zero tolerance approach.

MSIAP has a responsibility to ensure that implementing partners, and others engaged in implementation, follow this Policy or develop their own following the MSIAP guiding principles and standards. They include:

- Business partners (i.e., MSI Country Programs, any individual or company contracted by MSIAP to conduct a service, including consultants and suppliers)

- Social franchisees
- Visitors (including donors, consultants, researchers, journalists, and supporters).

All the people to whom this Policy applies are collectively referred to as “**MSIAP People**”.

5. Raising Awareness

- 5.1. A copy of this Policy will be placed on the MSI Asia Pacific website.
- 5.2. All MSIAP staff (new and existing) will be informed about this Policy and will either receive, or have access to, hard copies of it. Posters and flyers containing key information on how to raise concerns will be displayed throughout the offices of MSI and its entities.
- 5.3. Training on the Policy will be given to all MSIAP staff as part of the general training on MSIAP’s anti- fraud and bribery programme, or be addressed in other MSIAP trainings. Senior management will receive additional training on how to deal with concerns when they are raised, and how to protect the individuals who raise them.

6. What Should be Reported?

6.1 All MSIAP People and implementing partners have a responsibility to raise any concerns that they have about:

- i. the conduct of colleagues, directors, trustees, business partners or others acting on behalf of MSI or its entities, or
- ii. services provided by or to MSI or its entities

where the conduct or service provision:

- makes you feel uncomfortable in terms of known standards;
- is not in keeping with MSI or the relevant entity’s policies and procedures;
- appears to be unethical, immoral or dangerous in any respect;
- appears to breach the law;
- involves, or may involve:
 - sexual harassment, sexual misconduct, sexual abuse, or safeguarding issues;
 - terrorism or money laundering concerns;
 - harassment, bullying or discrimination;
 - breaches of privacy or confidentiality
 - breaches of our modern slavery policy;
 - fraud, bribery, deception or corruption;
 - neglect or abuse of clients;
 - unauthorised use of funds or other assets; or
 - damage to the environment.

This list is not exhaustive.

6.2 The staff, volunteers, contractors and partners who are, or become, aware of a possible wrongdoing must disclose that information.

7. Protecting Those who Speak Up

Support

- 7.1. MSIAP recognises that the decision to raise a concern can be a difficult one to make. If you honestly and reasonably believe that what you are saying is true, you should have nothing to fear because you will be doing your duty to MSI/its entities and all the clients who benefit from our mission.

If you raise genuine concerns:

- you will be given full support from senior management;
- your concerns will be taken seriously; and
- MSIAP will assign a contact person to you, and help you throughout any investigation.

Confidentiality

- 7.2. MSIAP will treat concerns that are raised with as much confidentiality as possible. We will not reveal your name or position without permission, unless we are required to do so by law or an enquiry results in a criminal investigation in which you are required as a witness.
- 7.3. We will also treat the identity of any person suspected of wrongdoing or malpractice as confidential, to the extent that we are able to do so.

No reprisals

- 7.4. MSIAP will not tolerate any harassment or victimisation of, or other form of reprisal (including informal pressure) against, any MSIAP People who raise concerns in good faith, and will take appropriate action to protect such MSIAP People. Any harassment, victimisation or other form of reprisal will be treated as a serious disciplinary offence and may result in dismissal. If you believe that you are being subjected to a detriment in the workplace as a result of raising concerns under this Policy, you should inform your contact person immediately (see section 7.1 above).

Anonymous allegations

- 7.5. This Policy encourages you to put your name to the concerns you raise wherever possible. If you do not tell us who you are, it will be much more difficult for us to protect you or give you feedback.
- 7.6. However, concerns that are raised anonymously will not be ignored. We will consider whether we can investigate them taking into account:
- the seriousness of the concerns raised;
 - whether the concerns are believable; and
 - whether we can sufficiently investigate the concerns based on the information provided, and, if not, whether it is possible to confirm the concerns from other sources.

Unfounded allegations

- 7.7. If you raise a concern in good faith and it is not confirmed by investigation, we will not take any action against you.
- 7.8. If, however, you make a deliberately false or misleading allegation, we will take appropriate disciplinary or legal action against you.

8. How to Raise Concerns

- 8.1. If you have concerns, you must not attempt to investigate them yourself. You should raise concerns promptly with your line manager or, if you believe that your line manager may be involved in the issue that you are concerned about, your line manager's manager. If you are not comfortable approaching your line manager (or your line manager's manager), you may raise concerns with either of the following:
 - the Country Director (in the case of country programmes) or Finance Director (in the case of support offices); or
 - the external, confidential speaking up service which is independent of MSIAP. The speaking up service can be accessed by:
 - telephone, using the telephone number for your country that is listed in **Appendix 1** to this Policy;
 - webmail: www.safecall.co.uk/report; or
 - email: speakingup@safecall.co.uk.
- 8.2. When raising concerns, you must disclose as much information as possible, such as relevant background information, names, dates, places and the reason for the concerns. You can raise concerns in writing, by telephone or in a face-to-face meeting. The earlier you speak up, the easier it will be for us to take effective action.
- 8.3. You are not expected to prove to us that your concerns are true. However, we do expect you to have reasonable grounds for your concerns, and to tell us why you think they may be true.
- 8.4. You may invite a colleague to be present for support during any meetings or interviews in connection with the concerns you have raised.

9. What Happens After You Raise Concerns?

How we respond

9.1. We will respond to your concerns as quickly as possible. For fraud and bribery reports, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take. Concerns raised may be addressed in one or more of the following ways:

- investigated by the country programme or support office in question;
- investigated by Group Internal Audit;
- referred to the relevant external auditor;
- referred to the police;
- investigated by a relevant external body; or
- form the subject of an independent inquiry.

Some concerns may be resolved by agreed action without the need for an investigation. If urgent action is needed, this will be taken before any investigation is conducted. See Mandatory Standard 1: *How to Handle Suspicions of Fraud and Bribery* for more detail.

- 9.2. Concerns that do not relate to fraud or bribery will be dealt with in accordance with the appropriate internal policy and/or procedure, to be determined by the nature of the report.
- 9.3. Should an investigation be deemed appropriate, this will be conducted in accordance with MSIAP's commitment to carrying out thorough and objective investigations. More details of which can be found in MSIAP's Anti-Fraud and Bribery policy.

How we give you feedback

9.4. After you have raised a concern, a contact person will be assigned to you (see section 7.1). The person will, so far as possible:

- inform you about whether your concern will be investigated;
- give you an approximate time frame for dealing with the matter;
- inform you if your further assistance is required; and
- update you at the conclusion of the matter.

The amount of contact between you and those investigating your concerns will depend on the nature of the concerns and the clarity of your information. You may be asked to meet with those investigating so that they can be certain that they have fully understood your concerns.

10. Monitoring and Review

10.1. Various strategies will be used to monitor implementation of this Policy, including, but not limited to, the following:

- Random checks will be carried out to assess the extent to which MSIAP staff are aware of the Policy.
- Feedback on using the Policy will be sought from those who have raised concerns.
- Statistics will be compiled on how the Policy is working in practice.
- The effectiveness of the Policy will be assessed as part of the internal audit of country programmes or support offices, conducted by Group Internal Audit.



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- 10.2. This Policy will be reviewed periodically by the MSI Asia Pacific Finance team and/or the Legal and Donor Compliance team in London.



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APPENDIX 1

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Safecall: Telephone Numbers by Country Programme and Support Office

NOTE: You will be charged to call the UK numbers below. However, you may ask to be called straight back. The free of charge numbers below may be called by you without charge to you. They are literally “free” as the charge will be passed to MSI.

UK Numbers

Afghanistan	+44 191 5167756
Bangladesh	+44 191 5167756
Burkina Faso	+44 191 5167764
Ethiopia	+44 191 5167764
Ghana	+44 191 5167764
Kenya	+44 191 5167764
Madagascar	+44 191 5167764
Malawi	+44 191 5167764
Mali	+44 191 5167764
Mongolia	+44 191 5167766
Myanmar	+44 191 5167761
Nepal	+44 191 5167761
Niger	+44 191 5167764
Nigeria	+44 191 5167764
Papua New Guinea	+44 191 5167764
Senegal	+44 191 5167764
Sierra Leone	+44 191 5167764
Tanzania	+44 191 5167764
Timor-Leste	+44 191 5167767
Uganda	+44 191 5167764
Yemen	+44 191 5167756
Zambia	+44 191 5167764
Zimbabwe	+44 191 5167764

Free of Charge Numbers

Australia	1800 312928
Austria	00800 72332255
Belgium	00800 72332255
Bolivia	800 110328
Cambodia	1800 209761
China (China Telecom)	10800 4400682
China Unicom/Netcom	10800 7440605
India	000800 4401256
Mexico	01800 1231758
Pakistan	00800 900 44036
Philippines	1800 14410499
Romania	03727 41942
South Africa	0800 990243
Sri Lanka (Colombo)	2423109
Sri Lanka (outside Colombo)	011 2423109
UK	0800 9151571
USA	1 866 901 3295
Vietnam (VNPT)	120 11157
Vietnam (Viettel)	122 80725

Fraud and Bribery Case Studies

1. A doctor in one of the country programmes saw repeated instances of client safety procedures being ignored by members of staff in a clinic. As he was anxious that his line manager might take his concerns as personal criticism, he used Safecall to raise them. At MSI's request, the Country Director of the programme carried out an investigation into the concerns, which resulted in the doctor's line manager and one nurse being taken through a disciplinary process and a change in client safety protocols being implemented.
2. A member of staff in procurement noticed would-be suppliers of contraceptives handing unmarked envelopes of money to a colleague. She reported the issue to her line manager who investigated and discovered that the colleague in question had been accepting bribes from would-be suppliers on a regular basis over the last two years. As a result of what the colleague had been doing, the country programme had not been sourcing its contraceptives from suppliers offering the most favourable terms, and had been spending money on contraceptives that could have been used in other operational areas. The colleague was dismissed.
3. A member of the outreach team noticed another member, a nurse, falsifying figures to make it look like she had provided services to more women than was in fact the case. On the third occasion that he witnessed this, he decided to notify it to the Country Director. The concern was investigated and found to be true. The nurse was dismissed and MSI strengthened its data validation controls. MSI was able to inform the donors who were funding the outreach programme that it had identified a number of incidents of fraud and had acted quickly to deal with them, thereby winning the donors' respect and trust.
4. In one country programme, a member of the finance department had a long-standing grudge against a member of the audit team. He therefore pretended to his line manager that the member of the audit team had stolen contraceptives from the programme and sold them to a local hospital. On investigation, it was quickly discovered that there was no evidence to substantiate this concern and that it had been deliberately made up to cause trouble for the member of the audit team. The member of the finance department was dismissed.
5. One of the drivers in a country programme reported to his line manager that a fellow driver was using the programme's vehicles for personal purposes. The vehicle movements of the accused driver over the last few months and over the next month were carefully examined, and it was discovered that what the reporting driver had thought was a personal purpose was in fact a legitimate purpose that had been authorised by the Country Director. The line manager thanked the reporting driver for bringing the concern to his attention, and the matter was dropped.

Other Case Studies

6. A partner NGO routinely changes their method for payment. On occasion, they have been insistent on being paid in cash and at times they have been insistent on being paid in various foreign bank accounts, despite holding offices locally. The finance assistant raised the concern with her line manager, the Finance Director. A decision was made to stop using this supplier and to report the organisation in line with anti-terrorism legislation requirements.
7. A nurse works closely with Dr Stuart. Dr Stuart routinely tells the nurse that she is “looking good”, is “so pretty”, and “must have lots of boyfriends”. He only makes these comments when the two are alone together. Dr Stuart frequently touches the nurse, including patting her on the back or thigh and telling her “job well done”. Dr Stuart is widely respected as an intelligent and dedicated physician. He is always talking about the need to help women and so is seen as being supportive of women’s rights. The nurse feels very uncomfortable with this behaviour. She sends an email to the Country Director with her concerns. The Country Director requests HR to look into the matter, and an official warning is given to the Doctor. Efforts are made to ensure the nurse feels comfortable and safe in her place of work.
8. A 32 year old client visits Marie Stopes for assistance with long-acting contraception methods. A treating doctor closes the door behind her as she enters the consultation room. After 10 minutes, the receptionist has a need to speak to the doctor and walks in forgetting to knock. She sees that the client is lying down on the table with her t-shirt and bra off and the doctor is bent over her. As the client leaves, she pays for an IUD insertion. The receptionist is confused as this service does not require the client to remove her top or bra. The receptionist sends an email to Safecall. The Safecall report is forwarded to the Country Director who launches an investigation. The doctor is suspended and the investigation reveals a pattern of inappropriate behaviours. The doctor is dismissed and the national medical board is informed.