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# IPU policy on whistleblowing and protection against retaliation

1 March 2025

# Table of contents

- 1. Introduction ..... 3
- 2. Terms and definitions ..... 3
- 3. Objectives ..... 4
- 4. Scope ..... 4
- 5. Protected activity ..... 5
- 6. Roles and responsibilities ..... 5
- 7. Support ..... 5
- 8. Confidentiality ..... 6
- 9. Requirements for reporting misconduct: Promptness and good faith ..... 6
- 10. Reporting alleged misconduct ..... 7
- 11. How to report ..... 9
- 12. Reporting retaliation ..... 9
- 13. Options to seek informal guidance and support or to pursue matters through other established mechanisms ..... 9
- 14. Monitoring ..... 10
- ANNEX ..... 11

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This Policy may be revised periodically in the light of experience gained and technical developments. Any modification will be notified to the users in due course through policy amendment.

## 1. Introduction

- (a) The IPU has zero tolerance for fraud, corruption or other forms of misconduct and is committed to ensuring that the Organization functions in an open, transparent and fair manner.
- (b) This Policy promulgates and clarifies the rights and responsibilities of IPU personnel and external service providers with respect to reporting suspected misconduct, encourages them to raise concerns and enables the IPU to address such cases.
- (c) This Policy also constitutes the framework and procedures to protect whistleblowers against retaliation, address such situations and manage the associated risks.
- (d) This Policy comes into effect as of the date of issue.

## 2. Terms and definitions

- (a) "Misconduct" is an intentional, reckless or negligent failure by a member of IPU personnel or external service providers to observe his/her obligations under the Fraud and Corruption Prevention and Control Policy, Financial Regulations, Code of Conduct for IPU Personnel, Staff Rules and Regulations, Policy to prevent and address harassment, including sexual harassment, at IPU Assemblies and other IPU events, or any other contractual obligations on IPU personnel. It is not possible to provide an exhaustive list of all the behaviour that constitutes misconduct. However, examples of behaviour that may be considered misconduct include, but are not limited to:
  - i. theft, dishonesty, or obtaining or attempting to obtain an advantage at the expense of the IPU or any person, firm or organization that is, or may be a partner or supplier of the IPU;
  - ii. harassment, including sexual harassment;
  - iii. abuse of authority;
  - iv. neglect of or failure to perform the duties of employment, including without limitation, failure to disclose material information of a business or legal nature to managers;
  - v. improper use, waste or abuse of the IPU's resources;
  - vi. failure to disclose a material conflict of interest;
  - vii. knowingly making malicious and/or unsubstantiated reports of misconduct or knowingly providing false or misleading information in an investigative process; interference or non-cooperation with an investigative process;
  - viii. retaliation;
  - ix. acts or behaviour that would discredit the IPU;
  - x. assisting in, or contributing to, the commission of misconduct by others.
- (b) "Retaliation" and "retaliatory action" refer to any direct or indirect detrimental action that adversely affects the employment or working conditions of a member of IPU personnel or external service provider, where such action has been threatened or taken for the purpose of punishing, intimidating or injuring an individual because that individual engaged in a protected activity. For purposes of this Policy, the legitimate application of regulations, rules or administrative policies, issuances or procedures, or the mere expression of disagreement, admonishment, criticism or a similar expression regarding work performance, conduct or related issues within a supervisory or similar relationship, do not constitute retaliation.

Examples of behaviours that may be considered retaliation include, but are not limited to:

- i. harassment;
- ii. discrimination;
- iii. unsubstantiated negative performance appraisals;
- iv. unjustified contractual changes: termination, demotion, reassignment or transfer;
- v. unjustified modification of duties;
- vi. unjustified non-authorization of holidays and other types of leave;
- vii. malicious delays in authorizing travel or the provision of entitlements;
- viii. threat to the whistleblower, their family and/or property.

- (c) “Protected activity” is understood as the reporting by a whistleblower, in good faith and through the channels specified in this Policy, of misconduct. The transmission or dissemination of unsubstantiated rumours is not a protected activity. Making a report or providing information that is intentionally false or misleading constitutes misconduct and may result in disciplinary or other appropriate action.
- (d) “Whistleblower/reporter” is any person who, in good faith and voluntarily, reports suspected misconduct, or has cooperated with a duly authorized official audit or investigation.
- (e) “IPU Staff members” refers to an individual employed by the IPU under staff rules and regulations.
- (f) “IPU personnel” includes all IPU staff members, individual consultants and interns.
- (g) “External service provider” refers to a company or individual that delivers services to the IPU but operates independently from it such as vendors.

### 3. Objectives

- (a) The IPU has an obligation to its Member Parliaments, personnel, partners and other stakeholders to:
  - i. use the resources entrusted to it efficiently, effectively and in accordance with its contractual obligations;
  - ii. comply with internal rules and regulations as well as international treaties, conventions and other agreements;
  - iii. follow best practices and conduct its activities in ways that meet high ethical standards, as well as environmental and health and safety standards;
  - iv. ensure the intellectual integrity of its research and publications;
  - v. be accurate in reporting its financial, administrative, operational and other activities;
  - vi. take all necessary, relevant measures to protect all personnel and external service providers against retaliation in the context of an oversight activity or when they make a report of misconduct, and from further acts of retaliation when retaliation has occurred in the context of such activity.
- (b) This Policy has been established to:
  - i. define the duty of all IPU personnel and external service providers to report that misconduct has occurred, or any reasonable belief that misconduct may have occurred;
  - ii. provide the means and communication channels for all IPU personnel and external service providers to report misconduct while protecting them against identity disclosure;
  - iii. protect IPU personnel and external service providers against retaliation when making such reports or cooperating with audits and investigations;
  - iv. encourage IPU personnel and external service providers to raise legitimate and honest concerns and describe the actions that will be taken to deal with claims of retaliation.

### 4. Scope

- (a) This Policy applies to:
  - i. all IPU personnel, regardless of their type of appointment or its duration; and
  - ii. all External service providers.
- (b) This Policy is not applicable to external parties or to personnel of IPU partners<sup>1</sup> who cannot be granted the procedural guarantees set out under this Policy or the guarantees against retaliatory threats or actions by or against any person that takes place outside a workplace situation.
- (c) The reporting under this Policy is separate from, and an alternative to, the already established channel for submitting reports of misconduct defined under other IPU policies such as Anti-harassment policy through the dedicated mailbox [speakout@ipu.org](mailto:speakout@ipu.org), and does not replace this channel or mailbox.

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<sup>1</sup> IPU partners refers to a diverse group of organizations, entities and stakeholders that collaborate with the IPU to support and advance its mandate and programmes. These partners may include, but are not limited to, the United Nations and its agencies, non-governmental organizations (NGOs) and civil society organizations.

- (d) The Director responsible for Support Services is designated as the officer responsible for the implementation of this Policy.
- (e) This Policy is shared with all IPU personnel and external service providers that may be concerned. Furthermore, this Policy will be incorporated into “Ethics and Code of Conduct” training sessions and posted on the official IPU website.
- (f) Compliance with this Policy is mandatory for all individuals who fall within its scope.

## **5. Protected activity**

- (a) All the IPU personnel and external service providers are required to adhere to the highest standards of efficiency, competence and integrity. It is the duty of staff members to report any breach of the Organization’s regulations and rules and to cooperate with duly authorized audits and investigations. In addition, they must cooperate with duly authorized evaluations, inquiries and reviews. The affiliated workforce of the IPU (consultants, experts or interns), as well as external service providers, must uphold and promote the highest standards of ethical and professional conduct, report misconduct, and cooperate with duly authorized audits, investigations, evaluations, inquiries and reviews.
- (b) Accordingly, any member of IPU personnel or external service provider is entitled to protection against retaliation under this Policy if they engage in the following protected activities:
  - i. Reporting alleged misconduct in good faith;
  - ii. Cooperating with a duly authorized audit, investigation, inquiry, evaluation or review, including the provision of witness testimony before the relevant authorities; or
  - iii. Contacting, cooperating with or participating in the activities during mediation.

Recourse to mediation is discretionary, not obligatory, whistleblower who communicates, cooperate or participate with a mediator designated by the Secretary General for a given complaint is also eligible for protection.

- (c) While any member of IPU personnel or external service provider engaging in these protected activities may seek protection against retaliation, such a request for protection against retaliation or their engagement in protected activities does not shield the person from accountability for any of their own conduct in the underlying matter. Notwithstanding their request for protection against retaliation or their engagement in protected activities, such individuals may face disciplinary or other appropriate action for their role in the matter under investigation. Neither an investigation, nor the imposition of any disciplinary or other appropriate measure resulting from a person’s responsibility in the underlying matter under investigation, constitutes retaliatory action as defined in this Policy.
- (d) The transmission or dissemination of unsubstantiated rumours is not a protected activity. For example, making a report or providing information that is intentionally false or misleading constitutes misconduct and may result in disciplinary or other appropriate action.

## **6. Roles and responsibilities**

- (a) The Secretary-General, Directors and line managers have a duty to:
  - i. familiarize themselves with the contents of this Policy; and
  - ii. take steps to promote awareness of the Policy.
- (b) IPU and external personnel have a duty to comply with the Policy.

## **7. Support**

- (a) Support and advice on the implementation of this Policy are available from the following sources:
  - i. IPU personnel are encouraged to initially communicate their concerns in writing to their immediate manager. For external service providers, such concerns should be directed to the IPU Manager referred to in their service agreement. Line managers are then expected to handle the matter with complete confidentiality and escalate it to the Director of Support Services for further guidance and appropriate action.

- ii. In those instances where they are not comfortable doing so or if the concern relates to their line manager, the reporter may also make a written report directly to the Director of Support Services or the officer in charge of legal affairs. If none of these acts on the complaint, the reporter may also make a written report to the Secretary General.
- iii. Staff members may also seek advice or assistance from the Staff Council and a Staff Council member may make a report on their behalf, through designated channels described under section 11.

## **8. Confidentiality**

- (a) All whistleblowing disclosures made to the IPU are confidential.
- (b) It may be the preference of the whistleblower to report anonymously. The whistleblowing communication channel facilitates the ability to make anonymous disclosures and provides a mechanism for the IPU to request additional information if needed, while maintaining the anonymity of the reporter.
- (c) The IPU will maintain a whistleblowing communication channel that complies with its data protection policy and ensures complete anonymity for whistleblowers. This channel will allow individuals to raise concerns while safeguarding the confidentiality of their reports. It is accessible through the IPU's webpage.
- (d) The IPU will respect and protect the confidentiality of the identity of whistleblowers who make reports in good faith and ensure that there is no retaliation against them. Breaches of this provision will be treated as serious violations subject to the IPU's disciplinary provisions.
- (e) There may be certain situations where the IPU may be required, when pursuing legal actions relating to the reported non-compliance, and with prior notice to the whistleblower, to share the identity of the whistleblower with outside law enforcement or judicial authorities. In these cases, the relevant authorities will be asked by the Secretary General to respect the confidentiality of their sources, but it is recognized that this may not always be possible.
- (f) This Policy does not override, but rather complements, any responsibility of IPU personnel or external service providers to report concerns externally to local health and safety or law enforcement authorities in cases of immediate danger to life and safety, or where criminal action is taking place.
- (g) Any staff member of the IPU or any representative of the Staff Council to whom information is disclosed in connection with the procedure hereunder, shall respect the confidential character and personal nature of such information. Information disclosed in whatever manner and to whichever person in this process is classified as "personal" in terms of data protection policy.
- (h) Where an allegation is made in good faith, even where it is not able to be confirmed by an investigation or is subsequently proved untrue, no action will be taken against the whistleblower.

The use of the confidential whistleblowing communication channel to make reports in bad faith, e.g. without any factual basis and for the deliberate purpose of victimizing someone or disrupting the operations of the IPU, will not be tolerated. Breaches in this regard will be treated as a serious violation, subject to the IPU's disciplinary provisions under the IPU policies and rules.

## **9. Requirements for reporting misconduct: Promptness and good faith**

In order for a member of personnel or an external service provider making a report of misconduct to receive protection under this Policy, the following must apply:

- (a) the member of personnel or external service provider must make the report of misconduct as soon as possible and not later than 12 months after the individual becomes aware of the alleged misconduct;

- (b) the individual must make the report in good faith, in the overall interests of the IPU and not only for personal benefit, and must submit evidence to support a reasonable belief that misconduct has occurred;
- (c) in the event that the report of misconduct is filed anonymously, no administrative decision or disciplinary measure will be taken unless there is sufficient, reliable and probative evidence that provides a factual foundation for the action proposed.

## 10. Reporting alleged misconduct

- (a) It is preferred that the whistleblower identify themselves when reporting under the above confidential options, in order to assist with the investigation of the matter being raised. The whistleblower's identity will be protected by those investigating and making reports and by those receiving reports. The whistleblower's identity shall not be disclosed without their permission and only if it is necessary to share the identity of the person making the report with outside law enforcement, judicial authorities or in order to ensure due process in the investigation of the allegations made.
- (b) Reports submitted via the whistleblowing communication channel will be received by the officer in charge of legal affairs of the IPU.
- (c) The Director of Support Services and the Secretary General will be informed of all allegations. In any situation where a member of the investigative body, or any individual involved in the review, investigation, or decision-making process of a whistleblower report has been named in the complaint or has a personal or professional relationship with the subject of the complaint, or any other conflict of interest, that individual must promptly recuse themselves from the matter. Failure to recuse in situations where a conflict exists may result in disciplinary action. The recused individual will not participate in any further discussions, reviews, or decisions related to the whistleblower complaint to ensure impartiality and integrity of the process. A substitute investigator or decision-maker will be appointed, if necessary, to ensure an unbiased investigation. The recusal will be documented in the investigation record, and the whistleblower will be informed of the recusal, ensuring transparency in the process.
- (d) On receipt of a report, the Director of Support Services or the officer in charge of legal affairs will acknowledge receipt within seven days. The officer in charge of legal affairs will ensure that initial review of the information provided is done within 30 days of the report and determine if there are grounds to initiate an investigation. If an investigation is determined to be necessary, it will be carried out by the officer in charge of legal affairs under the supervision of the Director of Support Services. This investigation must be carried out promptly.
- (e) Additional external support, e.g. legal support or investigative support mandated by the IPU, may be sought to complete the assessment of the case.
- (f) If it appears that there has been an act of gross misconduct, the IPU may be required to take disciplinary action against a member of IPU personnel. The outcome of the investigation report, with points for consideration stated by the Director of Support Services, will be shared with the Secretary General for further action.
- (g) If the matter reported is deemed to be out of scope, it will be closed by the Director of Support Services upon the advice of the officer in charge of legal affairs and the reporter will be informed accordingly. If it is deemed that there is a case of misconduct, then the reporter will be advised of the outcome of the investigation by the Director of Support Services or the Secretary General.
- (h) In cases where a complaint is filed against the Secretary General of the IPU concerning allegations of misconduct under this Policy, a structured mechanism will be followed to ensure transparency, impartiality and accountability. The complaint process will be managed as follows:

- i. Initial review
  - Upon receipt of a complaint against the Secretary General, the Director of Support Services and the officer in charge of legal affairs will conduct a primary review. This initial step includes:
    - Verifying the validity of the complaint in line with the requirements of this Policy.
    - Ensuring that the complaint meets the threshold for potential misconduct as outlined under this Policy.
    - Safeguarding the confidentiality of the whistleblower's identity to prevent retaliation.
    - During this primary review, neither the Director of Support Services nor the officer in charge of legal affairs will approach or consult with the Secretary General about the complaint. This separation ensures objectivity and minimizes any potential influence or bias in the initial review phase.
- ii. Engagement of an external investigation agency
  - If the primary review establishes grounds for further investigation, the IPU will engage an independent external investigation agency. The external agency will:
    - Conduct a thorough, unbiased investigation into the allegations.
    - Gather evidence, interview witnesses, and assess the conduct of the Secretary General in accordance with relevant standards of accountability and ethics.
    - Coordinate directly with the Secretary General to ensure the independence of the investigation process and to maintain the integrity of the communication flow.
    - Produce a comprehensive report with findings and conclusions based on the evidence collected.
- iii. Reporting and assessment of findings
  - Upon completion, the investigation report will be submitted to the Oversight and Ethics Committee. The Committee will:
    - Review the findings and conclusions presented by the external investigation agency.
    - Determine whether the evidence substantiates the alleged misconduct by the Secretary General.
- iv. Disciplinary action
  - If misconduct is substantiated, the Oversight and Ethics Committee will recommend appropriate disciplinary actions in accordance with IPU policies and procedures.
  - The Oversight and Ethics Committee will coordinate the implementation of disciplinary actions, ensuring that they align with IPU regulations and uphold organizational integrity.
- v. Confidentiality and protection of the whistleblower
  - Throughout the process, all actions will prioritize confidentiality and protection for the whistleblower, ensuring their safety from retaliation and supporting the integrity of the whistleblower policy.

If it is deemed that there is a case of misconduct, the reporter will be advised of the outcome of the investigation by the Director of Support Services. The Oversight and Ethics Committee will inform the Secretary General of the outcome of the investigation.

This mechanism ensures that complaints against the Secretary General are handled with the highest standards of transparency and objectivity, promoting a culture of accountability and ethical conduct at the level of the IPU's leadership.



## 11. How to report

### Director of Support Services

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- Directly write a report to the Director of Support Services including all the details mentioned in Annex.

### Dedicated email

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- Reports of misconduct related to harassment, including sexual harassment, occurring during IPU Assemblies or other events can be sent immediately to the email address [speakout@ipu.org](mailto:speakout@ipu.org) or to the person designated as a focal point for that Assembly or event.

### Online

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- Visit the IPU official website and report a concern online.

## 12. Reporting retaliation

### (a) Request for protection from retaliation

A member of IPU personnel or an external service provider who believes that retaliatory action has been threatened or taken against them because they have reported misconduct or cooperated with an audit or investigation may submit a request for protection to the Director of Support Services or the officer in charge of legal affairs. They should forward all information and documentation available to them to support their request as soon as possible.

The request for protection must be submitted no later than 12 months after the date on which the individual became aware that the alleged retaliation had been threatened or taken.

### (b) Action to prevent retaliation

When informed of the risk of retaliation, the Director of Support Services shall contact the whistleblower and inform him/her on appropriate actions to prevent retaliation. With the whistleblower's consent, such action may include engagement by the Director of Support Services with his/her line manager or senior management to prevent any retaliatory action against the whistleblower as a consequence of his/her engagement in a protected activity.

### (c) Interim protections

Pending the completion of an investigation into a report of retaliation, appropriate measures may be taken at the discretion of the Secretary General, upon the advice of the Director of Support Services, to safeguard the interests of people who provide information or cooperate in an investigation or audit. Such measures may include the temporary reassignment of the individual to a different office or position or, in exceptional circumstances, placing the person on special leave with full pay.

### (d) Remedies

If retaliation is confirmed, appropriate corrective action will be taken by the Secretary General to remedy the situation in consultation with the individual concerned. Such action may involve rescinding a decision which is determined to have stemmed from retaliation, including reinstatement. If deemed necessary, it may also involve the reassignment or transfer of the individual to another work location or assignment at the same grade level for which he or she is qualified.

## 13. Options to seek informal guidance and support or to pursue matters through other established mechanisms

- (a) The IPU encourages the informal resolution of conflicts. Therefore, notwithstanding any other provisions of this Policy, if a concerned individual believes he/she may have been subjected to, or are threatened with, retaliation, they may, at their discretion, contact the Director of Support

Services or the officer in charge of legal affairs to initiate an informal resolution of the underlying matter (i.e. the issue that has given rise to the concern about retaliation). The individual may also request that a third person, acceptable to both parties, mediate.

- (b) Pursuit of informal resolution of a matter, grievance or interpersonal problem that may form the basis of a complaint of retaliation may not prevent or preclude the independent and eventual institution of disciplinary or other administrative action against the alleged retaliator.

#### **14. Monitoring**

- (a) The Secretary General will provide updates to the Executive Committee on actions taken under this policy, ensuring that no confidential information is disclosed.
- (b) The IPU shall conduct orientation and awareness-raising activities to support the implementation of this procedure, including “Ethics and Code of Conduct” training sessions.

**ANNEX**

**WRITTEN REPORT OF MISCONDUCT**

1. What conduct have you observed that you believe to be inappropriate? (Please describe exactly what took place. Use additional pages, if necessary)
  
2. Who is involved in the misconduct? (Please provide their names, functional titles and organizational units, addresses and telephone numbers)
  
3. Where did the reported incident or activity take place? (Please be specific about the time(s) and place(s) where the incident(s) occurred)
  
4. Can you provide documentary evidence to support the allegation(s)?  
YES \_\_\_\_\_ NO \_\_\_\_\_
  
5. To the best of your knowledge, are any other IPU personnel aware of this misconduct? If so, how did they find out about it? Are they aware that you are making this report?

Please complete the following:

Name of the person reporting the incident (optional): \_\_\_\_\_

Signature (optional):

Date: \_\_\_\_\_

Telephone no (optional): \_\_\_\_\_

Email address: \_\_\_\_\_