

ACCOUNTABILITY LAB GLOBAL

Document 03: Speak Up Policy

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Owner	Co-CEO, Innovation and Operations
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Adopted by	AL Board of Directors
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Next review due	24 September 2028
Part of	The AL Global policy set, Documents 00 to 20. Document 00, the Alignment, Roles and Ownership Register, is the control document for the set.

Amended 24 September 2026. Reinstatement of at-will employment for US-based staff. Staff based outside the United States are employed under the labour law of the country where they work.

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1. Why one policy

AL previously had three overlapping documents: a whistleblower policy, a grievance procedure and a harassment complaint procedure. They gave different routes, different timelines and different protections for what is often the same event. Someone being sexually harassed by their manager could have used any of the three, with different results.

This is one document. It has four tracks. You do not have to know which track your concern belongs to. Report it, and the person receiving determines the appropriate track.

2. Who can use this policy

Track A: Wrongdoing (whistleblowing). Anyone. Employees, board members, fellows, interns, volunteers, consultants, donors, contractors, partner staff, programme participants, community members and members of the public.

Track B: Harm to a person (safeguarding, harassment, discrimination, bullying). Anyone.

Track C: Employment dispute (grievance). AL Global employees, **including employees of Model A fiscally sponsored projects**, EOR's, fellows and interns.

Model A project staff are AL Global employees, so AL is the employer for any grievance, disciplinary matter or dismissal. They use this policy, not a client organisation's procedure, and no fiscal partnership agreement can route them elsewhere. Managers in fiscally sponsored projects need to know this: pointing an AL employee at their project's own process instead of this one exposes AL to a claim under a procedure it did not write.

Track D: Programme complaints. Programme participants, community monitors, partner organisations and community members.

Model C fiscally sponsored partners are separate employers. Their staff use their own procedure for employment disputes. For Tracks A, B and D they may use this policy directly, and the flow-down clause in the grant agreement requires the client to have a route of equal or higher standard, assessed by the Director of Business Development/ Fiscal Partnership Lead at onboarding.

Network Lab staff should normally use their own organisation's procedure. Where the concern involves AL Global staff or funds, where the local route is unsafe, or where the local route has failed, they may use this policy directly.

3. What you can raise

Track A: Wrongdoing

- Fraud, theft, bribery, corruption or misuse of funds
- Falsifying records, reports or results
- Breaking the law or a regulatory requirement
- Breaching a donor or grant condition
- Endangering someone's health or safety
- Damaging the environment
- Failing to act on a known risk
- Covering up any of the above

Track B: Harm to a person

- Sexual exploitation, abuse or harassment
- Any other safeguarding concern under the Safeguarding and PSEAH Policy
- Bullying, intimidation, coercive management or humiliation
- Discrimination or harassment on any ground listed in the Code of Conduct
- Retaliation against someone who has spoken up
- Exposing someone's identity, testimony or location in a way that puts them at risk

Track C: Employment disputes

- Pay, contract terms, benefits, leave, working conditions
- Performance management, assessment or promotion decisions
- Disciplinary action, other than an unrecorded verbal warning
- Workload, restructuring, changes to duties
- Any decision by AL affecting your employment

Track D: Programme complaints

- Conduct of AL staff, fellows or partners towards participants or communities
- Failure to deliver what was promised
- Selection or exclusion decisions
- Payment of stipends, expenses or per diems
- Anything else about how AL does its work

4. How to report

You may use any route. You do not need to try one route before another. You do not need permission. You do not need to use a form.

Route	Use it for	Notes
Your line manager, or any manager you trust	Anything	Often the fastest route where the manager is not involved
Co-CEO	Anything, particularly money, conduct or employment	
Global Safeguarding Lead or Deputy	Anything involving harm to a person	See Safeguarding and PSEAH Policy

Route	Use it for	Notes
AL Global Board Speak Up and Safeguarding Lead	Concerns about a Co-CEO, senior management or the Board, or where internal routes feel unsafe	Bypasses management entirely
Chair of the Board	Where the Board Speak Up Lead is unavailable or is the subject of the concern	
Regulators, donors, police, or a lawyer	Anything	Your legal right. You do not need AL's permission and you do not have to tell us first

AL does not currently operate an independent external reporting channel. Every internal route above runs through people who work together. The last row is therefore not a formality; it is a genuine option and using it is not disloyalty.

You may report verbally or in writing, in any language AL can arrange translation for, and anonymously.

Contact details are in Annex A, which is updated as post holders change.

If someone is in immediate danger, act first. Call emergency services or get the person to safety, then report within 24 hours.

Anonymous reports

We take anonymous reports seriously. They often mean someone is afraid, not that the concern is weak.

Be honest with yourself about the limits: if we cannot come back to you for detail, we may not be able to establish what happened, and we cannot tell you the outcome or protect you from retaliation we do not know about. Where you can, give us a way to contact you that does not identify you.

5. Timelines

All periods are **working days**, meaning Monday to Friday excluding public holidays where the person handling the matter is based. This definition applies throughout the policy. The old procedures mixed calendar days, business days and unqualified “days”; that has been fixed.

Stage	Deadline
Report acknowledged	3 working days

Stage	Deadline
Immediate safety or interim measures considered	Same day
Initial assessment complete, track assigned, reporter told what happens next	10 working days
Investigation or informal resolution complete	30 working days
Extension where genuinely needed, with written reason and a new date	Once, up to a further 30 working days
Outcome communicated	5 working days after the decision
Appeal lodged	10 working days from the outcome
Appeal decided	20 working days

For Track C employment disputes, there is an additional informal stage before the clock starts. See section 7.

Where a deadline cannot be met, the person handling the matter must write to the reporter with the reason and a new date before the deadline passes. Missing a deadline without explanation is a management failure and is reportable under this policy.

How long you have to raise something. For Track C employment disputes, raise it within **six months** of the event, or of when you first knew about it. There is **no time limit** on Track A wrongdoing, Track B harm to a person, or Track D programme complaints. Historic disclosure is normal, particularly in abuse cases.

6. What happens: Tracks A, B and D

- **Acknowledgement.** Within 3 working days, in writing where we have a way to reach you.
- **Safety first.** Whoever receives the report considers whether anyone is at risk, including risk of retaliation, and puts interim measures in place the same day. Interim measures may include suspension on full pay of the person the concern is about. Suspension is neutral and is not a finding.
- **Initial assessment.** Within 10 working days, someone independent of the matter establishes what is alleged, who is involved, which track applies, whether an investigation is needed, and whether anyone external must be notified. The reporter is told the outcome of this step.
- **Conflict check.** Anyone with a personal interest in the matter, or who is named in it, steps out. If the Co-CEO is conflicted, the Board Speak Up Lead takes over. If a Co-CEO is involved, that Co-CEO steps out entirely, and the Board Speak Up Lead takes over.

- **Investigation.** Conducted by someone with no prior involvement. For serious matters, matters involving senior management, or matters beyond internal capacity, AL commissions an external investigator. The investigation establishes facts. It does not decide discipline.
- **Fairness to the person accused.** They are told what is alleged in enough detail to respond, and given a genuine opportunity to respond, at the point where doing so will not put anyone at risk or destroy evidence. They may bring a colleague or representative to any meeting.
- **Decision.** Made by someone with authority and no involvement in the matter. Where the investigation was external, the decision remains AL's.
- **Outcome.** Both parties told within 5 working days, in writing. The reporter is told what was concluded and, in general terms, that action has been taken. They are not given confidential detail about another person's discipline. Where a concern was not substantiated, we say so and explain why.
- **Follow-up.** The investigator recommends changes to prevent recurrence. The Co-CEO, Innovation and Operations is responsible for implementing them and reporting to the Board on whether they happened.
- **Record.** All reports are logged in the Speak Up register. Safeguarding matters are additionally logged in the safeguarding incident register.

For Track B safeguarding matters, the Safeguarding and PSEAH Policy governs and its escalation triggers apply.

7. What happens: Track C employment disputes

Informal stage

Raise it with your line manager first if you can. Most disputes are resolved in a conversation. Your manager should respond within 10 working days. If the dispute is with your line manager, or raising it with them is not safe or sensible, go straight to the formal stage.

Formal stage 1

Put it in writing to a Co-CEO. Set out what happened, why you disagree with it, and what you want done. You may use the form in Annex B or write it your own way. Both are fine.

The Co-CEO, Innovation and Operations, or someone they appoint who is independent of the dispute, investigates, meets you, and responds in writing within 30 working days. You may bring a colleague or representative to any meeting.

Formal stage 2: appeal

If you are not satisfied, appeal in writing to the Co-CEOs within 10 working days. The Co-CEOs, or a designated senior person who has had no involvement, review it and respond in writing within 20 working days.

Where the dispute involves a Co-CEO, the appeal goes to the AL Global Board Speak Up Lead instead.

Formal stage 3: external resolution

- **Mediation, offered first.** Either party may propose mediation by an independent mediator agreed between them. Mediation is voluntary. AL pays the mediator's full fee. Nothing said in mediation is used in any later process. Mediation does not stop the clock on any legal deadline.
- **Arbitration, at the employee's choice only.** Where a dispute is not resolved, the employee may choose binding arbitration as a faster and cheaper alternative to court. AL may propose it but cannot require it. If the employee declines, the dispute proceeds through whatever legal route the employee chooses.
- **AL pays.** Where arbitration is used, AL pays the arbitrator's fees, the administrative fees of the arbitration body, and the cost of the venue in full. Each party pays its own legal representation. AL will contribute to the employee's reasonable legal costs where the employee's income makes representation unaffordable; the amount is decided by the Board Speak Up Lead, not by management.
- **How employment can end.** Employment of US-based staff is at will (Employee Handbook, section 3.1). At will never permits dismissal or any other action in retaliation for speaking up, and it does not reduce any protection in section 8 of this policy. Staff based outside the United States are dismissed only in line with the labour law of the country where they work and the country annex.
- **No forced arbitration of harassment, discrimination or abuse claims.** Claims of sexual harassment, sexual assault, discrimination or safeguarding-related harm are never subject to compulsory arbitration. The employee may go to court, to the Equal Employment Opportunity Commission, or to any other competent body, at any time.
- **Burden of proof.** For staff outside the United States, AL bears the burden of showing that a disciplinary or dismissal decision was fair and had a proper basis. For US-based staff, where someone says a decision was retaliation for speaking up, AL must be able to show from its records that it would have made the same decision if the person had not spoken up.
- **Nothing is waived.** Nothing in this policy prevents anyone from going to a court, a regulator, an employment agency, the police, a donor, or a lawyer, at any stage, without telling AL first. Any clause anywhere in AL's documents that purports to prevent this has no effect.

- **Non-US staff.** For staff engaged by AL Global outside the United States US arbitration bodies are not an appropriate forum. Those staff have access to the employment dispute mechanisms of the country where they work, and AL will not argue that this policy displaces them. Where local law gives a stronger protection than this policy, local law applies. Where local law gives less, this policy applies. Network Lab employees are employed by their own organisation and use its procedure.

8. Protection for people who speak up

No retaliation

Retaliation is gross misconduct. It includes dismissal, demotion, changed duties, exclusion from meetings or opportunities, withdrawn assignments or travel, negative references, pay or promotion decisions, and informal freeze-out or hostility.

Retaliation against a consultant, fellow, partner or participant, including ending a contract, withdrawing a grant, or removing someone from a programme, is equally prohibited.

If you think you are being retaliated against, report it under this policy. It is treated as a new and separate concern, handled by someone not involved in the original matter.

Good faith

If you report in good faith you are protected, even if you turn out to be wrong. You do not need proof. You do not need to be certain. A reasonable suspicion is enough.

Protection does not extend to someone who knowingly makes a false report, or who reports to deflect from their own misconduct. That is a disciplinary matter. Being mistaken is not.

Confidentiality

We share your identity only with people who need it to handle the matter. We tell you before we share it, wherever we can.

Sometimes we cannot keep it confidential, usually because the facts point to you, because a disciplinary process requires it, or because a court or the police require it. We will tell you if we think that is likely, so you can decide what you want to do.

Once you have reported, do not discuss the concern more widely than necessary. This is to protect the investigation and the people involved, not to silence you. It does not stop you talking to a lawyer, a doctor, a union, a regulator or a trusted supporter.

Federal whistleblower rights (US federal awards)

AL Global is a prime recipient on a US federal award. Two things follow, and both are legal requirements rather than AL choices.

Your rights under 41 U.S.C. 4712. If you work on a federal award, you cannot be discharged, demoted or otherwise discriminated against for disclosing information you

reasonably believe is evidence of gross mismanagement of a federal grant, gross waste of federal funds, abuse of authority relating to a federal grant, a substantial and specific danger to public health or safety, or a violation of law, rule or regulation related to a federal grant.

You may disclose to a range of recipients, including a member of Congress, a federal Inspector General, the Government Accountability Office, a federal employee responsible for oversight of the grant, a court or grand jury, or a management official at AL. **You do not need to raise it inside AL first.** A complaint of reprisal is made to the Inspector General of the funding agency and must be brought within three years of the alleged reprisal.

These rights cannot be waived by any agreement, policy, form or condition of employment. Nothing in this policy, your contract, or any settlement or severance agreement limits them.

This section exists partly to serve as AL's written notice to employees under 2 CFR 200.217, which requires recipients and subrecipients to inform employees in writing of these rights, in the predominant language of the workforce. AL passes the same requirement down in every subaward.

AL's own disclosure duty. Separately, under 2 CFR 200.113, AL must disclose in writing and in a timely way, to the federal awarding agency and its Office of Inspector General, all violations of federal criminal law involving fraud, bribery or gratuity that potentially affect a federal award. The Co-CEOs and the Co-CEO, Innovation and Operations are jointly responsible for making that disclosure. This duty exists regardless of the outcome of any internal process, and an internal investigation is not a reason to delay it. Failure to disclose can result in remedies up to suspension and debarment.

No gagging

AL will not ask anyone to sign anything that prevents them from reporting misconduct to a regulator, donor, court, the police or a professional body. This applies to employment contracts, settlement agreements, severance agreements, consultancy contracts and grant agreements. Any existing clause with that effect will not be enforced.

Support

Anyone who reports, or who is the subject of a report, may have a colleague or representative with them at any meeting. AL will fund counselling for anyone affected. Reasonable time off to attend meetings or deal with the impact is paid.

9. Oversight

- The Co-CEO, Innovation and Operations maintains the Speak Up register: date, track, how it came in, who handled it, timeline compliance, outcome, and action taken. Names are held separately with restricted access.
- The Co-CEO, Innovation and Operations reports quarterly to the Co-CEOs and annually to the Governance Committee, which puts it to the full Board, covering

volume, type, source, timeliness, outcomes, patterns and recurring themes. The report is anonymised.

- The Board reviews whether people actually use this policy. Very low numbers are treated as a warning sign, not a success.
- The Co-CEOs report all Track A and Track B matters to the Board Speak Up Lead. Where a Co-CEO is involved, the Board Speak Up Lead handles it directly.
- This policy is reviewed every two years by the Governance Committee, which recommends it to the full Board, or sooner if the law changes.

How this fits AL's committee structure. AL Global has two standing board committees, Finance and Governance. Speak Up oversight sits with Governance. Track A matters with a financial dimension, such as fraud, misuse of grant funds or a donor clawback, are referred to the Finance Committee for the financial consequences while Governance retains the conduct question. The ad hoc Audit subcommittee that convenes under Finance during the audit period is a useful place to raise control weaknesses that surface through Speak Up reports; it is not a reporting route for individuals and no Speak Up matter waits for it to convene.

Annex A: Where to report

Updated by the Co-CEO, Innovation and Operations as post holders change. Changing this annex does not require Board re-approval.

Route	Name	Contact	Date updated
Co-CEO, Innovation and Operations	Jean Scrimgeour	jean@accountabilitylab.org	1 October 2026
Global Safeguarding Lead, AL Global	Corina Rebegea	Corina@accountabilitylab.org	1 October 2026
Deputy Global Safeguarding Lead	Leah Shearman	Leah@accountabilitylab.org	1 October 2026
Co-CEOs, AL Global	Blair Glencorse	Blair@accountabilitylab.org	1 October 2026
	Cheri-Leigh Erasmus	Cheri@accountabilitylab.org	
AL Global Board Speak Up and	Danai Nhando	danai.nhando@gmail.com	1 October 2026

Route	Name	Contact	Date updated
Safeguarding Lead			
Translocal Network Safeguarding Leads (7 countries)	TBD		
Chair of the Board	Maria Poli	mariapolidemichele@gmail.com	1 October 2026
Independent external reporting channel	Not currently in place		

External bodies. You have the right to go to these directly, at any time, without telling AL. Details should be filled in and verified by AL before this policy is issued; I have deliberately not put contact details or web addresses here because I would be guessing at their current form.

- US Equal Employment Opportunity Commission, for discrimination and harassment claims relating to US employment
- The relevant state labour agency
- The Internal Revenue Service and the relevant state charity regulator, for misuse of charitable funds
- The relevant labour authority or commission in South Africa and Nepal for staff based there
- The relevant donor, under the terms of the applicable grant agreement
- Police, in any country, for suspected criminal conduct

Annex B: Report form

Optional. A written note, an email or a conversation is equally valid.

- Your name, role and contact details, or write “anonymous”
- Date of this report
- What track, if you know: wrongdoing, harm to a person, employment dispute, programme complaint. Leave blank if unsure
- What happened. Dates, places, who was there, what was said or done

- How you know. Directly witnessed, told by someone, saw a document, other
- Who is affected
- Who the concern is about, if applicable
- Is anyone at risk right now
- Have you raised this before, with whom, and what happened
- Do you have any documents or records
- What do you want to happen
- Are you worried about retaliation, and from whom
- Do you need translation, or any adjustment to take part