



TUNISIAN INSTITUTE FOR PEACE AND CONFLICT STUDIES

POLICY DOCUMENT · TIPCS-POL-05

Whistleblowing and complaints policy

Safe, confidential reporting of misconduct, protection against retaliation, and a fair complaints mechanism for participants and the public

Anyone can raise a concern or complaint about TIPCS by email (Contact@tipcs.org, subject "CONFIDENTIAL – Concern"), through the website, by post or in person, with or without giving their name. TIPCS acknowledges within 3 working days, assesses within 10 working days, answers reports within 60 days where possible and service complaints within 15 working days, protects good-faith reporters against any retaliation, respects the rights of the person reported, and never limits the right to report directly to the public prosecutor, the competent authorities or a donor.

TIPCS-POL-05 · Version 1.0 · 25 October 2026

Issued by the Secretary General · ratified by the Board of Directors · legally reviewed

Questions and concerns: Contact@tipcs.org · www.tipcs.org

Contents

1	Purpose and commitment
2	Scope
3	Definitions
4	Guiding principles
5	Legal and standards basis
6	Roles and responsibilities
7	Reporting channels
8	Handling procedure for whistleblowing reports
9	Confidentiality and data protection
10	Protection against retaliation
11	Rights of the person reported
12	Outcomes, corrective action and external notification
13	Complaints mechanism for participants, beneficiaries and the public
14	Record-keeping and retention
15	Annual reporting, monitoring and review
16	Training and awareness
17	Breaches and sanctions
18	Relationship to other TIPCS policies
19	Glossary of abbreviations
20	Approval and version history
A	Annex A — Report and complaint form
B	Annex B — Case log template
C	Annex C — Investigation plan and report template
D	Annex D — Response letter templates
E	Annex E — Process flowchart (numbered steps)

1. Purpose and commitment

The Tunisian Institute for Peace and Conflict Studies (TIPCS) depends on the trust of its members, partners, donors, research participants, trainees and the public. That trust requires that anyone who sees wrongdoing, or who is dissatisfied with the way TIPCS has treated them, can say so safely and receive a fair and timely answer. This policy establishes how TIPCS receives, assesses, investigates and responds to (a) whistleblowing reports about suspected misconduct and (b) complaints about its services, publications and decisions, and how it protects the people who raise them.

TIPCS shall treat every report and complaint seriously, impartially and confidentially; shall never tolerate retaliation against a person who speaks up in good faith; shall respect the rights of any person who is the subject of a report; and shall use what it learns to correct errors and improve its governance. Raising a concern is an act of loyalty to the Institute and to its mission of peace and integrity, not an act of disloyalty.

2. Scope

2.1 Persons covered

This policy may be used by anyone, inside or outside TIPCS: members of the Board, the Chairperson, the Vice-Chairperson, the Secretary General, the Treasurer, members of the Executive team and of the departments, employees, interns, volunteers, experts, researchers and consultants; members of the association; partners, sub-grantees and suppliers; trainees of the Academy, event participants and research participants; donors; and members of the public. It also protects persons connected to a reporter, such as relatives, colleagues and witnesses, and persons who assist an investigation.

2.2 Matters covered

The policy covers two streams that share the same channels but follow different tracks:

Stream	Examples	Track
Whistleblowing report (concern about misconduct)	Fraud, bribery, theft, misuse of funds, forged documents, undeclared conflicts of interest; sexual exploitation, abuse or harassment; discrimination, bullying, violence, unsafe working conditions; breaches of law, of TIPCS policies or of donor rules; sanctions or terrorism-financing concerns; misuse of personal data; research misconduct; retaliation against a reporter.	Sections 7 to 12 (triage, investigation, outcome).
Complaint (dissatisfaction with a service or decision)	Errors of fact in a publication; quality or organisation of a course, event or membership service; communications; refusal of an application; treatment by staff that does not amount to misconduct.	Section 13 (complaints mechanism).

Where a complaint reveals possible misconduct, it is re-classified as a whistleblowing report and the person is informed. Ordinary employment grievances (for example a disagreement about leave or tasks) are handled under the staff rules, unless they involve discrimination, harassment, retaliation or another form of misconduct listed above. This policy does not replace legal proceedings and does not limit any right that a person holds under Tunisian law.

3. Definitions

Term	Meaning in this policy
Reporter (whistleblower)	Any person who, in good faith and on reasonable grounds, reports information about suspected misconduct connected with TIPCS.
Complainant	Any person who expresses dissatisfaction with a TIPCS service, publication, decision or conduct and expects a response.
Subject of a report	The person or entity whose conduct is called into question.
Case Manager	The officer who receives and administers a case: the Secretary General by default, or the Chairperson (or Vice-Chairperson) under the conflict rules in section 6.
Investigator	An internal or external person, with no stake in the matter, appointed in writing to establish the facts.
Retaliation	Any direct or indirect detriment, threatened or actual, because a person reported, complained, or assisted an investigation: dismissal, non-renewal, demotion, transfer, loss of work or grants, harassment, exclusion, threats, damage to reputation, or legal action in bad faith.
Good faith	An honest and reasonable belief that the information is true at the time of reporting, even if it later proves mistaken.
Survivor-centred approach	An approach that puts the safety, wishes, dignity and well-being of a person affected by abuse or harassment at the centre of every decision.
Working day	Monday to Friday, excluding public holidays in Tunisia. Periods in days without qualification are calendar days.

4. Guiding principles

- Safety first: the physical and psychological safety of reporters, complainants, survivors and witnesses takes priority over any other consideration, including the speed of an investigation.
- Confidentiality: information is shared strictly on a need-to-know basis.
- Impartiality and independence: nobody handles a case in which they are involved or have an interest, and senior people are never investigated by their subordinates.
- Fairness: the presumption of good conduct, the right to be heard and decisions based on evidence.
- Accessibility: channels are free, available in Arabic, French and English, and adapted to persons with disabilities or limited literacy.
- Timeliness and transparency of process: people are told what will happen, when, and why if there is a delay.
- Proportionality and learning: responses are proportionate to the seriousness of the matter, and lessons feed into policies and training.

5. Legal and standards basis

This policy applies Tunisian law and the international standards that TIPCS's partners expect. Where they differ, TIPCS applies the provision that gives the greater protection to reporters and affected persons, without ever restricting a legal right.

5.1 Organic Law No. 2017-10 of 7 March 2017

Organic Law No. 2017-10 of 7 March 2017 on reporting corruption and protecting whistleblowers (published in the JORT of 10 March 2017) is the core Tunisian text. Its main features, as relevant to TIPCS, are the following:

- **Scope:** Article 2 defines corruption broadly (conduct contrary to law and regulations, including bribery in the public and private sectors, embezzlement, abuse of office, conflicts of interest, illicit enrichment and money laundering) and defines the private sector so as to include associations. Reports concerning an association such as TIPCS therefore fall within the law.
- **Whistleblower:** Article 2 defines the whistleblower as any natural or legal person who, in good faith, reports to the competent authorities information giving serious presumptions or reasonable grounds to suspect corruption, in accordance with the conditions and procedures of the law.
- **Direct reporting to justice:** Article 4 provides that the law does not prevent reporting corruption directly to the competent judicial authorities.
- **Competent body:** the law designates the national anti-corruption authority (Instance nationale de lutte contre la corruption, INLUCC) to receive reports and decide on protection; public structures must also designate internal units. The internal-unit obligation applies to public structures and not to associations; TIPCS nevertheless adopts an equivalent internal channel as good practice.
- **Protection:** the law protects whistleblowers and persons closely connected to them against any form of retaliation, discrimination or intimidation and against criminal, civil or administrative proceedings because of the report (Article 19); the whistleblower does not bear the burden of proof (Article 20); persons who knowingly make false reports intended to harm others are excluded from protection and are liable to penalties; the identity of the whistleblower may not be disclosed without consent; legal aid is available (Article 24).
- **Sanctions:** the law punishes disclosure of a whistleblower's identity and retaliation against a whistleblower with fines and imprisonment.
- **Rewards:** Government Decree No. 2019-1124 of 9 December 2019 sets the mechanisms and criteria for a monetary reward to whistleblowers when reports lead to the recovery of funds.

Status of the competent authority: the activity of INLUCC has been suspended since August 2021, and in June 2025 a bill to amend Organic Law No. 2017-10 was referred to a committee of the Assembly of the Representatives of the People. Until the situation is clarified, TIPCS shall direct persons who wish to report corruption to an external body to the public prosecutor (procureur de la République) or to any authority that the law designates at the time, and shall review this section as soon as the law is amended.

5.2 Other Tunisian texts

Text	Relevance
Decree-Law No. 2011-88 of 24 September 2011 on associations	Transparent management, use of resources for the statutory purpose, accounts and declaration of foreign funding (Article 41).
Organic Law No. 2004-63 of 27 July 2004 on the protection of personal data	Lawful, limited and secure processing of the personal data contained in reports; rights of data subjects; supervision by INPDP.
Organic Law No. 2017-58 of 11 August 2017 on eliminating violence against women	Sexual harassment and violence, including in the workplace; support for survivors.
Organic Law No. 2016-61 of 3 August 2016 on preventing and combating trafficking in persons	Exploitation of persons; referral of suspected trafficking.

Text	Relevance
Organic Law No. 2015-26 of 7 August 2015 on combating terrorism and money laundering, as amended by Organic Law No. 2019-9	Suspicious transactions and terrorism-financing concerns; role of CTAF.
Penal Code and Labour Code	Offences such as embezzlement, forgery, bribery, defamation and false denunciation; employment rights and disciplinary procedure.

5.3 International standards

- United Nations Convention against Corruption (UNCAC), ratified by Tunisia, in particular Article 33 on the protection of reporting persons.
- Core Humanitarian Standard on Quality and Accountability (2024 edition), Commitment 5: people and communities can safely report concerns and complaints and get them addressed.
- IASC Six Core Principles relating to Sexual Exploitation and Abuse and the UN Secretary-General's Bulletin ST/SGB/2003/13, as required by UN partners.
- Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, used as a benchmark of good practice (it does not bind TIPCS directly), and the reporting obligations in EU, UN and foundation grant agreements.

6. Roles and responsibilities

Role	Responsibilities
Board	Adopts this policy; receives the annual anonymised report; is informed of serious cases; decides sanctions against Board members; ensures resources for external investigations.
Chairperson	Case Manager for concerns about the Secretary General, the Treasurer or the Executive team; receives sealed letters; decides on requests for review of complaint outcomes; reports serious cases to the Board.
Vice-Chairperson	Case Manager for concerns about the Chairperson, or when the Chairperson is otherwise conflicted.
Secretary General	Issues this policy; is the default Case Manager; keeps the confidential case log; appoints investigators (except where conflicted); ensures acknowledgements, timelines and records; prepares the annual report; organises training.
Treasurer	Supports financial investigations; may suspend payments or freeze access to accounts as an interim measure on request of the Case Manager; is excluded from any case concerning financial matters under the Treasurer's responsibility.
Executive team and heads of department (including Research)	Promote the policy; forward any concern received to the Case Manager within one working day without investigating it themselves; implement corrective actions; protect team members from retaliation.
All personnel	Report suspected misconduct promptly; cooperate truthfully with investigations; respect confidentiality; never retaliate.
Investigator	Establishes the facts impartially under written terms of reference; signs a confidentiality and no-conflict declaration; produces a written report.

Conflict rule: if the default Case Manager is the subject of a report, is closely connected to the subject or has any interest in the matter, the case passes immediately to the next officer in this order: Secretary General, Chairperson, Vice-Chairperson, and then a Board member designated by the Board who is not involved. Any person who receives a report about themselves must pass it on unopened or unread, if possible, and must not take part in any step of the case.

7. Reporting channels

7.1 Internal channels

A report or complaint may be made orally or in writing, in Arabic, French or English, using any of the following channels. The form in Annex A may be used but is not compulsory.

Channel	How to use it	Who reads it
Email	Contact@tipcs.org with the subject "CONFIDENTIAL – Concern" (or "Complaint" for a service complaint).	Secretary General; Chairperson where the concern is about the Secretary General or the Executive team.
Website contact form	Contact page, "General enquiry", message starting with the word CONFIDENTIAL.	As for email.
Post or hand delivery	Sealed envelope marked "Confidential – for the Chair of the Board", Avenue Mahmoud Bourguiba, Monastir 5000.	Chairperson; the envelope must be forwarded unopened.
In person or by telephone	Meeting with the Secretary General or the Chairperson, who records the report in writing and offers the reporter a copy to confirm.	The officer met.
Through a manager or focal person	Any manager, project focal person or event organiser who receives a concern forwards it to the Case Manager within one working day.	Case Manager.

7.2 External channels

Nobody is required to use the internal channels first. A reporter may at any time address the public prosecutor or another competent judicial authority (Article 4 of Organic Law No. 2017-10), the anti-corruption authority designated by law, the labour inspectorate for employment matters, INPDP for personal-data matters, the police or the specialised units for violence against women, CTAF through the channels provided by law for suspicious transactions, or the donor concerned through its own fraud or misconduct reporting line. TIPCS shall publish on its website the contact points of these bodies and of its main donors' reporting lines, and shall cooperate fully with any lawful request.

7.3 Anonymous reports

TIPCS accepts and examines anonymous reports through any channel. Their credibility is assessed on the precision of the facts and the possibility of verifying them. Because TIPCS cannot ask follow-up questions or give feedback, reporters are encouraged to create a dedicated email address or to provide another secure means of contact without revealing their identity. TIPCS shall never try to identify an anonymous reporter, and any attempt to do so by any person is misconduct. Anonymous reports do not, however, benefit from the formal protection procedure of Organic Law No. 2017-10, which requires the reporter to be identified to the authority; TIPCS's own protection under section 10 applies to any reporter whose identity later becomes known.

7.4 What a report should contain

- What happened, when and where, and how often.
- Who was involved, including witnesses.
- How the reporter knows (direct observation, documents, hearsay).
- Any documents or evidence, without taking unlawful steps to obtain them.
- Any risk to the reporter or others, and whether the matter has been reported elsewhere.

Reporters should not investigate on their own, confront the person concerned or share the report with colleagues or the media, as this can endanger them and compromise the case.

8. Handling procedure for whistleblowing reports

8.1 Receipt and acknowledgement

On receipt, the Case Manager opens a case in the confidential case log (Annex B), assigns a reference number in the form WB-YYYY-NNN for reports and CP-YYYY-NNN for complaints, and sends an acknowledgement within 3 working days (Annex D, letter D1), unless the report is anonymous with no contact details. The acknowledgement explains the next steps, the expected timelines, the protection available and the right to report externally.

8.2 Immediate risk check

Within 24 hours of receipt, the Case Manager checks whether anyone faces an immediate risk of harm (for example sexual abuse, violence, threats, or imminent loss of funds or evidence). If so, the Case Manager takes or requests urgent protective measures without waiting for the initial assessment: referral to medical, psychosocial or legal services with the consent of the person concerned, alerting the police where life or safety is at risk, separating the persons involved, suspending a payment, or securing documents and devices. Where a child may be at risk, the duty to notify the child protection delegate (délégué à la protection de l'enfance) under the Child Protection Code applies.

8.3 Initial assessment (triage)

Within 10 working days of receipt, the Case Manager completes a written initial assessment that decides: whether the matter is within the scope of this policy; whether it is a whistleblowing report or a complaint; its seriousness category; whether a referral to the authorities or a notification to a donor is required; and who will investigate. The assessment may involve discreet preliminary checks of documents, but no interview of the subject at this stage.

Category	Typical matters	Investigation route	Who is informed
1 – Critical	Sexual exploitation or abuse; violence; risk to a child; fraud or theft involving a senior officer; terrorism-financing or sanctions concern; any matter involving the Chairperson, Secretary General or Treasurer.	External independent investigator; Board oversight.	Chairperson (or Vice-Chairperson) and Board within 2 working days; donor and authorities as required.
2 – Serious	Fraud or misuse of funds; harassment or discrimination; serious breach of donor rules; research misconduct; retaliation; significant data breach.	Internal investigator independent of the area concerned, or external investigator.	Chairperson; donor where the grant agreement requires.
3 – Moderate	Minor policy breaches; undeclared minor conflicts of interest; inappropriate conduct not amounting to harassment.	Fact-finding by the Case Manager or a designated officer.	Recorded in the case log; annual report.

Category	Typical matters	Investigation route	Who is informed
4 – Out of scope	Matters unrelated to TIPCS, or ordinary employment grievances.	Closed with reasons, or redirected to the right procedure or body.	Reporter, with reasons.

8.4 Investigation

Within 5 working days of the initial assessment, the Case Manager appoints the investigator in writing and approves an investigation plan (Annex C, part 1) setting out the allegations, the questions to be answered, the evidence to be gathered, the persons to be interviewed, the safeguards for the reporter and witnesses, and the timetable. The investigator signs a declaration of confidentiality and absence of conflict of interest. Investigations shall be conducted in accordance with the following rules:

- Evidence is gathered lawfully and preserved securely; documents and data are copied, not removed, unless there is a risk of destruction.
- Interviews are conducted by two persons where possible, recorded in written minutes signed by the person interviewed, who may be accompanied by a person of their choice who is not involved in the case.
- In cases of sexual exploitation, abuse or harassment, a survivor-centred approach applies: the survivor is interviewed once if possible, by a trained person of the gender they prefer, with consent obtained for each step, and is never confronted with the alleged perpetrator.
- Where the facts may constitute a criminal offence, the Case Manager considers whether to refer the matter to the public prosecutor before or instead of an internal investigation, so as not to prejudice criminal proceedings.
- The standard of proof is the balance of probabilities: whether it is more likely than not that the alleged conduct occurred.
- Interim measures (such as paid precautionary suspension, change of reporting line, restriction of access to systems or premises) may be ordered to protect persons or evidence; they are not sanctions and do not prejudice the outcome.

The investigator delivers a written report (Annex C, part 2) setting out the allegations, the evidence, the response of the subject, the findings on each allegation (substantiated, not substantiated or inconclusive) and recommendations. The investigator does not decide sanctions.

8.5 Timeline summary

Step	Time limit
Forwarding by a manager who receives a concern	1 working day
Immediate risk check	24 hours
Acknowledgement with reference number	3 working days
Information of Chairperson and Board (category 1)	2 working days
Initial assessment	10 working days
Appointment of investigator and investigation plan	5 working days after the initial assessment
Progress update to the reporter	At least every 30 days

Step	Time limit
Written answer on the outcome to the reporter	60 days from receipt where possible, or written explanation of the delay and a new date
Notification of donor	Within the time limit set by the grant agreement (often immediately or within a few days)

9. Confidentiality and data protection

The identity of the reporter, and any information from which it could be deduced, shall not be disclosed without the reporter's explicit consent, except to the investigator and decision-makers who strictly need it, or where disclosure is required by law or by a court. If disclosure becomes legally necessary, the reporter is informed beforehand, unless that would jeopardise the proceedings. The identity of the subject of a report and of witnesses is protected in the same way.

Personal data in reports are processed in accordance with Organic Law No. 2004-63 for the sole purpose of handling the case. TIPCS shall: collect only the data necessary; keep case files in a restricted electronic folder with access limited to the Case Manager and named persons, and paper files in a locked cabinet; use encrypted channels when sharing case documents; inform the persons concerned of the processing at an appropriate time without prejudicing the investigation; respect their rights of access and rectification within the limits of the law and of the protection of others; and complete any formality required by INPDP for this processing.

A breach of confidentiality, including gossip about a case or attempts to find out who made a report, is misconduct under section 17 and may also be a criminal offence under Organic Law No. 2017-10.

10. Protection against retaliation

Any person who reports or complains in good faith, or who assists an investigation as a witness or otherwise, is protected against retaliation, even if the concern proves unfounded. Retaliation in any form, by any person acting for TIPCS, is serious misconduct and may also be a criminal offence under Organic Law No. 2017-10.

- At the acknowledgement stage the Case Manager assesses the risk of retaliation with the reporter and agrees protective measures, such as a change of supervisor, flexible working arrangements, or monitoring of the reporter's situation.
- Any decision affecting a reporter's position (contract, assignment, evaluation, grant) taken within 24 months after the report must be reviewed in advance by the Case Manager, and TIPCS must be able to show that it is based on grounds unrelated to the report.
- A complaint of retaliation is itself a category 2 report and is handled with priority; where retaliation is established, TIPCS shall remedy it, for example by reinstatement, restoration of a contract or assignment, correction of records and an apology.
- Protection does not shield a reporter from the consequences of their own misconduct that is unrelated to the report, but reporting one's own involvement may be taken into account as a mitigating factor.

Knowingly false or malicious reports are not protected. A report that turns out to be mistaken is not malicious. Only where it is established that a person knowingly made a false accusation intended to harm someone may disciplinary action be taken, without prejudice to the penalties provided for by law.

11. Rights of the person reported

A person who is the subject of a report is presumed to have acted properly until the facts are established. TIPCS guarantees them the following rights:

- To be informed of the allegations in sufficient detail to respond, at a time chosen so as not to endanger the reporter or compromise evidence, and in any event before any finding is made against them.
- To be heard, to present documents and to suggest witnesses, and to be accompanied by a person of their choice not involved in the case.
- Confidentiality and protection of their reputation; information about the case is shared only on a need-to-know basis.
- To be informed of the outcome and of any decision concerning them, with reasons, and to use the internal appeal or legal remedies available, including the disciplinary guarantees of the Labour Code for employees.
- Where the allegations are not substantiated, to have no record of the case placed in their personnel file and, on request, to receive written confirmation that the matter is closed.

12. Outcomes, corrective action and external notification

On the basis of the investigation report, the competent decision-maker takes a reasoned decision within 10 working days. The decision-maker is the Secretary General for staff, interns, volunteers, consultants and suppliers; the Chairperson where the Secretary General is conflicted or the subject is a member of the Executive team or the Treasurer; and the Board, without the person concerned, for its own members and officers. Possible outcomes include:

- No further action, where allegations are not substantiated, with support for the persons affected by the process.
- Disciplinary measures in accordance with the Labour Code and the staff rules, termination of a consultancy, partnership or supply contract, removal from office, or exclusion from membership in accordance with the statutes.
- Recovery of funds or assets, and correction of financial reports to donors.
- Correction or withdrawal of a publication, with a dated note.
- Changes to procedures, controls, training or supervision to prevent recurrence.
- Referral to the public prosecutor or another competent authority.

Notification of donors: where a case concerns a project funded by a donor, the Secretary General (or the Chairperson where the Secretary General is conflicted) shall notify the donor in the form and within the time limit required by the grant agreement, without disclosing the reporter's identity unless the reporter consents or the law requires it. Referral to authorities: where facts may constitute a criminal offence, TIPCS shall refer them to the public prosecutor; suspected terrorism financing or money laundering shall be reported through the channels provided by law, including CTAF where applicable; and suspected trafficking or violence against women shall be reported to the competent specialised services, respecting the survivor's wishes as far as the law permits.

The reporter receives a written answer (Annex D, letter D2) explaining that the case has been examined, the general outcome and any action taken, as far as confidentiality and the rights of others allow. A reporter who is dissatisfied with the handling of the case may ask the Chairperson (or, where the Chairperson handled it, the Board) for a review within 20 working days.

13. Complaints mechanism for participants, beneficiaries and the public

In line with Commitment 5 of the Core Humanitarian Standard, TIPCS shall maintain a complaints and feedback mechanism that is safe, accessible and known to the people it works with: trainees of the Academy, participants in events and dialogues, research participants and communities, members, partners and the public.

13.1 Access and awareness

- Information on how to complain shall be given in Arabic and, where relevant, French and English, in course materials, event programmes, participant information sheets and consent forms for research, and on the website.
- At events and training sessions lasting more than one day, organisers shall provide a feedback form and a sealed box or an equivalent channel, and shall name a focal person who is not the main facilitator.
- Complaints may be made orally; staff record them faithfully and read them back to the complainant. Persons with disabilities, minors (through a parent, guardian or trusted adult) and persons with limited literacy are assisted.
- Making a complaint is free and never affects a person's access to TIPCS activities, certificates or services.

13.2 Handling and timelines

Step	Rule
Acknowledgement	Within 3 working days, with a CP reference number.
Screening	Any allegation of sexual exploitation, abuse, harassment, fraud or other misconduct is transferred immediately to the whistleblowing track (section 8).
Handling	Handled by a staff member not involved in the matter, under the supervision of the Secretary General.
Answer	Written answer within 15 working days explaining what was found and what has changed (Annex D, letter D3); errors of fact in publications are corrected openly with a dated note.
Review	A dissatisfied complainant may request a review by the Chairperson within 20 working days of the answer; the Chairperson decides within 20 working days. This is the final internal step.
External	Personal-data complaints may be brought to INPDP (www.inpdp.nat.tn); complaints about a donor-funded activity may also be addressed to the donor.

Feedback that is not a complaint (suggestions, compliments) is logged and considered by the team concerned. Each year, TIPCS shall check, through participant evaluations, whether participants know how to raise a concern and trust the mechanism, and shall adjust it accordingly.

14. Record-keeping and retention

The Case Manager keeps a single confidential case log (Annex B) and a file for each case containing the report, the acknowledgement, the initial assessment, the investigation plan and report, the decision, correspondence and evidence. Retention periods are as follows:

Record	Retention
Case log (anonymised summary)	Permanently, for statistics and audits

Record	Retention
Substantiated cases with action taken	5 years after closure, or longer where a donor agreement, audit or legal proceeding requires
Unsubstantiated or out-of-scope cases	Identifying data deleted or anonymised 6 months after closure, unless needed for proceedings
Service complaints	3 years after closure

15. Annual reporting, monitoring and review

Each year, by the end of the first quarter, the Secretary General shall present to the Board an anonymised report covering the previous calendar year, including: the number of reports and complaints by stream, category and channel; time taken at each stage against the time limits; outcomes; retaliation complaints; referrals to authorities and notifications to donors; lessons learned and changes made. No information enabling identification of a person shall appear in the report. A summary shall be published in the TIPCS annual report.

The Board shall review this policy every year (next review: October 2027), after any serious case, and whenever Organic Law No. 2017-10 is amended or a new competent authority is designated, taking into account the views of staff and participants.

16. Training and awareness

- All Board members, officers, staff, interns and volunteers shall receive a briefing on this policy within one month of joining and a refresher every two years, and shall sign the acknowledgement in their induction file.
- Officers who may act as Case Manager or decision-maker, and any internal investigator, shall complete training on handling reports, confidential interviewing and survivor-centred approaches before acting in a case.
- Partners and consultants shall be informed of the policy through contract clauses.

17. Breaches and sanctions

The following are misconduct and may lead to disciplinary measures, termination of contract, removal from office or exclusion from membership, without prejudice to civil or criminal liability: retaliation or threats of retaliation; breach of confidentiality or attempts to identify a reporter; obstruction of an investigation, destruction of evidence or pressure on witnesses; failure by a manager to forward a report; knowingly false or malicious reports; and failure to implement a decision taken under this policy.

18. Relationship to other TIPCS policies

This policy is the common reporting channel for all TIPCS policies: the Code of conduct; the Safeguarding and protection from sexual exploitation, abuse and harassment policy; the Anti-fraud, anti-corruption and gifts policy; the Conflict of interest policy; the Sanctions, counter-terrorism financing and due diligence policy; and the Research ethics and editorial independence policy. Where another policy sets specific rules for a type of misconduct (for example additional survivor-support measures under the safeguarding policy), those rules apply together with this policy.

19. Glossary of abbreviations

Abbreviation	Meaning
CHS	Core Humanitarian Standard on Quality and Accountability
CTAF	Tunisian Financial Analysis Commission
INLUCC	National Anti-Corruption Authority
INPDP	National Authority for the Protection of Personal Data
JORT	Official Journal of the Republic of Tunisia
PSEA	Protection from sexual exploitation and abuse
UNCAC	United Nations Convention against Corruption

20. Approval and version history

This policy is issued by the Secretary General following approval by the Board and enters into force on the date of issue. It replaces any earlier practice on the same subject.

Version	Date	Description
1.0	25 October 2026	First full edition, expanding the web summary.

Approval and document control

Document number	TIPCS-POL-05
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Date of issue	25 October 2026
Policy owner	Secretary General
Next review	October 2027 (and after any serious incident or change of law)
Applies to	Board members, staff, experts, researchers, interns, volunteers, consultants, partners and suppliers acting for TIPCS
Status	In force; ratified by the Board of Directors and legally reviewed

Version	Date	Change
1.0	25 October 2026	First issue

Issued by the Secretary General
Name, signature and date

Ratified by the Board of Directors — Chairperson
Name, signature and date

References

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2. PPLAAF, Whistleblowers in Tunisia: Overview of the Legal Framework (country report) — <https://www.pplaaf.org/wp-content/uploads/PPLAAF-Tunisia-Country-Report.pdf>
3. Government Decree No. 2019-1124 of 9 December 2019 (legislation-securite.tn) — <https://legislation-securite.tn/sites/default/files/law/%D8%A3%D9%85%D8%B1%20%D8%AD%D9%83%D9%88%D9%85%D9%8A%20%D8%B9%D8%AF%D8%AF%201124%20%D9%84%D8%B3%D9%86%D8%A9%202019%20%D9%85%D8%A4%D8%B1%D8%AE%20%D9%81%D9%8A%209%20%D8%AF%D9%8A%D8%B3%D9%85%D8%A8%D8%B1%202019.pdf>
4. Nawaat, Corruption en Tunisie : l'État abandonne les lanceurs d'alerte (2022) — <https://nawaat.org/2022/10/11/corruption-en-tunisie-letat-abandonne-les-lanceurs-dalerte/>
5. Webdo, Vers une nouvelle loi pour protéger les lanceurs d'alerte (June 2025) — <https://www.webdo.tn/fr/actualite/national/corruption-vers-une-nouvelle-loi-pour-protger-les-lanceurs-dalerte-en-tunisie/378027/>
6. L'Économiste Maghrébin, amendment bill to Organic Law 2017-10 referred to committee (June 2025) — <https://www.leconomistemaghrebin.com/?p=630656>
7. Core Humanitarian Standard on Quality and Accountability, 2024 edition — https://inee.org/sites/default/files/resources/ENG_CHS_2024_RGB.pdf
8. INPDP – Instance nationale de protection des données personnelles — <https://www.inpdp.nat.tn>

This document is public. It is a governance commitment and does not replace legal advice.

Annex A — Report and complaint form

You may leave your name blank to report anonymously. Send this form to Contact@tipcs.org (subject "CONFIDENTIAL – Concern" or "Complaint") or in a sealed envelope marked "Confidential – for the Chair of the Board", Avenue Mahmoud Bourguiba, Monastir 5000. Do not investigate yourself and do not share this form with others.

Part 1 – About you (optional)

Name

Relationship with TIPCS (staff, volunteer, participant, partner, supplier, member, public, other)

Safe way to contact you (email, telephone, other) and preferred language

Do you agree that your identity may be shared with the investigator? (yes / no / discuss first)

Part 2 – Your concern or complaint

Type: concern about misconduct / complaint about a service, publication or decision / not sure

What happened? Describe the facts as precisely as possible

When and where (dates, places, project or activity concerned)

Who was involved? Were there witnesses?

How do you know about it? (seen, documents, told by someone)

Documents or evidence attached (list)

Is anyone at risk now, including you? Please explain

Have you reported this elsewhere (authority, donor, other)?

What outcome would you like?

Date and signature (optional)

For TIPCS use only

Reference number / date received / channel

Received by (name, role)

Annex B — Case log template

Confidential. Kept by the Case Manager in a restricted electronic file. One row per case. Do not record names in the log; use the reference number and keep identities in the case file.

Ref.	Date received / channel	Stream and category (1-4)	Case Manager / investigator	Acknowledged (date)	Initial assessment (date)	Donor / authority notified (date)	Outcome and closure date
WB-2026-001							
CP-2026-001							

The example references above illustrate the numbering format only and do not refer to real cases.

Annex C — Investigation plan and report template

Part 1 – Investigation plan

Case reference and category

Investigator(s) appointed, date, and signed no-conflict and confidentiality declaration (yes/no)

Allegations to be investigated (numbered)

Applicable rules (law, TIPCS policy, donor clause)

Evidence to collect and how it will be secured

Persons to interview and order of interviews

Safety and protection measures for reporter, survivor and witnesses; interim measures

Need for referral to the prosecutor or notification of a donor

Timetable and budget (for external investigators)

Approved by the Case Manager (name, date, signature)

Part 2 – Investigation report

Summary of the case and of the allegations

Methodology: documents reviewed, interviews held (by role, not name), limitations

Evidence and analysis for each allegation

Response of the person reported

Findings for each allegation: substantiated / not substantiated / inconclusive

Recommendations (corrective, preventive, referral); systemic weaknesses identified

Investigator signature and date

Part 3 – Decision

Decision-maker (role), decision and reasons

Actions, responsible person and deadline

Communication to reporter, person reported, donor, authorities (dates)

Annex D — Response letter templates

D1 – Acknowledgement of a report or complaint

Reference: [WB/CP-YYYY-NNN] Date: [date]. Dear [name or "Sir/Madam"], TIPCS acknowledges receipt on [date] of your [report/complaint]. Thank you for raising it. Your message will be handled confidentially by [role] in accordance with the TIPCS Whistleblowing and complaints policy. An initial assessment will be completed within 10 working days and we expect to give you a written answer within [60 days / 15 working days]. If this is not possible, we will tell you why and when you can expect an answer. Your identity will not be disclosed without your consent, except where the law requires it. TIPCS does not tolerate any retaliation against persons who raise concerns in good faith; if you experience or fear any adverse treatment, please tell us immediately quoting the reference above. You also have the right to address the competent authorities, including the public prosecutor, or the donor concerned. Contact for this case: [secure contact]. Yours sincerely, [name, role], Tunisian Institute for Peace and Conflict Studies.

D2 – Outcome of a whistleblowing report

Reference: [WB-YYYY-NNN] Date: [date]. Dear [name], further to your report received on [date], we inform you that the matter has been [assessed/investigated] in accordance with our policy. [The concerns were found to be substantiated in whole or in part, and TIPCS has taken appropriate action / The investigation did not establish the facts reported / The matter has been referred to the competent authority.] [Where possible: measures taken include changes to procedures and controls.] For reasons of confidentiality and to respect the rights of the persons concerned, we cannot share details of individual measures. We thank you for having spoken up. Your protection against retaliation continues to apply. If you are dissatisfied with how your report was handled, you may request a review by [the Chair of the Board / the Board] within 20 working days of this letter. Yours sincerely, [name, role].

D3 – Answer to a service or publication complaint

Reference: [CP-YYYY-NNN] Date: [date]. Dear [name], thank you for your complaint of [date] concerning [subject]. We have looked into it and found that [summary of findings]. As a result, [we have corrected the publication with a dated note / we have changed our procedure / we consider that our decision was justified for the following reasons: ...]. We apologise for any inconvenience caused [where appropriate]. If you are not satisfied with this answer, you may request a review by the Chair of the Board within 20 working days, quoting the reference above. Complaints about personal data may also be brought to INPDP (www.inpdp.nat.tn). Yours sincerely, [name, role].

Annex E — Process flowchart (numbered steps)

Step	Action	Responsible	Time limit	Next step
1	Report or complaint received through any channel; forwarded unopened if addressed to a conflicted person	Any recipient	1 working day	2
2	Case opened in log, reference assigned; immediate risk check and urgent measures if needed	Case Manager	24 hours	3
3	Acknowledgement sent (letter D1)	Case Manager	3 working days	4
4	Initial assessment: stream, category, referral needs. Complaint: go to 9. Out of scope: close with reasons. Report: go to 5	Case Manager	10 working days	5, 9 or close
5	Category 1: inform Chairperson and Board; consider prosecutor referral and donor notification	Case Manager	2 working days	6
6	Investigator appointed, investigation plan approved (Annex C, part 1)	Case Manager	5 working days after step 4	7
7	Investigation, hearing of the person reported, written report (Annex C, part 2); updates to reporter	Investigator	Updates every 30 days	8
8	Reasoned decision; actions; notifications; outcome letter to reporter (D2)	Decision-maker	10 working days after report; target 60 days from receipt	10
9	Complaint handled by uninvolved staff member; written answer (D3)	Secretary General	15 working days from receipt	10
10	Request for review, if any, decided	Chairperson (or Board)	Request within 20 working days; decision within 20 working days	11
11	Case closed; log updated; retention rules applied; lessons recorded for the annual report	Case Manager	On closure	End