

ANNEX 4 Whistleblowing Policy



Introduction

This policy is implemented in order to encourage and enable whistleblowers to report on misconduct as soon as possible in the knowledge that they are able to do so without fear of intimidation, harassment, retaliation, reprisals, discrimination, or adverse employment consequence because of such report. With this policy we want to assure that staff and Associates of Free a Girl and local partner organizations, including children, young people and communities they work with, have the ability and confidence to report any (suspicions of) breaches of Free a Girl's standards of conduct as set out in the General Code of Conduct, the Anti-Fraud and Corruption Policy or the Child Safeguarding Policy.

Reporting (a suspicion of) non-ethical behaviour is seen as contributing to the functioning of Free a Girl as well as the transparency and accountability of the organisation. It is therefore important that whistleblowers report as quickly as possible.

Free a Girl Whistleblowing procedures provide, at a minimum:

- a) The possibility to make a (anonymous) notification to the Director or the Integrity Adviser;
- b) Guidance to Whistleblower(s) on how to report Whistleblowing Concerns, including reassurance that their confidentiality and, if desired, anonymity will be respected to the extent permitted by law;
- c) The prompt and proper investigation of all Whistleblowing Concerns to a consistent standard;
- d) A means for responses to recommendations made in Whistleblowing investigation reports; and
- e) The retention of all records of reported Whistleblowing Concerns and Whistleblowing investigations on a strictly confidential basis for the required periods.

Article 1 Application and Scope

1.1 This policy applies to all the Staff members and Associates of Free a Girl (hereinafter referred to as employee), and to local partner organizations, and offers them the opportunity to report on (suspected) misconduct of an ethical, operational or financial nature.

Article 2 Availability

2.1 This policy is available to all employees and local partner organizations. In addition, this policy is placed on the website of Free a Girl.

Article 3 General Provisions

3.1 Every employee is expected to report a (suspicion of) misconduct. A report must be made within a reasonable period but no longer than 13 weeks after taking notice of the misconduct. The notifier has the right to a confidential treatment. In Article 6 of this regulation the procedure which states the guarantee of confidentiality is included.

3.2 This regulation does not apply to complaints of a personal nature. Such complaints must always be discussed with the Director or Human Resources.

3.3 The notifier does not act out of personal gain. If there are deliberate false notifications, the notifier may receive a sanction.

Article 4 Registration point

4.1 The registration point is a selected person who acts as first point of contact for the notifier(s). The registration point, who is the Integrity Adviser, is an external person who is not involved in the day to day business of the organization and is part of the Advisory Board.

4.2 This person is responsible for conducting investigations in response to the report and reports annually on the reports made and the subsequent results.

4.3 Notifications can be made to the Director or to the Integrity Adviser via the following email address: integrity@freeagirl.nl.

Article 5 Record-keeping

5.1 The Integrity Adviser creates a confidential file for each report. All registrations and files are kept in a secured environment. The identification details of the notifier are stored in such a way that only the Integrity Adviser has access to it.

5.2 On annual basis the registration point makes a report of the incoming reports.

5.3 In this report statements are made about:

- The number and nature of the reports made;
- The number of reports that didn't lead to an investigation;
- The number of investigation that have been carried out;

5.4 This report will be made public in the annual report of the organization.

Article 6 Procedure

6.1 The employee, Associate, local partner organization, including children, young people and communities they work with, or other person reports on a (suspected) misconduct verbally or in writing as soon as possible, but at least 13 weeks after being notified.

6.2 The Integrity Adviser records the report with the date on which it was received in writing.

6.3 The Integrity Adviser investigates whether the report is admissible.

6.4 The Integrity Adviser informs the Director of the notification.

6.5 If the report concerns the Director, the Integrity Adviser informs the Child Safeguarding Representative or the Supervisory Board.

6.6 Immediately after reception of a report the Integrity Adviser and/or Director and/or Child Safeguarding Representative, and/or Supervisory Board initiate an investigation. They can approach persons who are able to provide information regarding the report.

6.7 During the investigation, the identity of the notifier is not disclosed and the necessary data will be objectified in such a way that the identity of the notifier cannot be derived out of the information.

6.8 The report is set aside if the investigation does not reveal any reason to believe that the report is true. The notifier will be informed of this.

6.9 Violation of regulations will be reported. This report also states which actions will be taken. The Integrity Adviser will also inform the reporter of the measures taken.

6.10 The investigation and settlement must be carried out within a period of eight weeks, after the first report. If the investigation and settlement of an incident cannot take place within eight weeks, the reporter will be notified by the Integrity Adviser and will indicate the period within he/she can await the outcome of the investigation and the settlement of the incident.

Article 7 Legal protection and privacy

7.1 An employee or other person who has reported a (suspicion of) misconduct will not be disadvantaged in any way as a result of reporting. The same applies to the person to whom the report relates until proven guilty.

7.2 Reprisals, expressions or behaviour of colleagues in a negative respect towards the reporter, as a result of reporting, are not accepted by Free a Girl and will always lead to sanctions.

7.3 As long as the employee does not state otherwise, the anonymity desired by him/her will be respected in accordance with the procedure, as set out in Article 6 (see above), to the extent permitted by law.

Article 8 Final provisions

8.1 The reporting files that have been declared inadmissible or unfounded will be destroyed five years after closure. Other reporting files are destroyed after internal processing or after (external) legal proceedings have been completed.

8.2 The person about who a report has been made has the right to inspect the file (with the exception of personal data) - before a decision has been made on his/her position - to correct any inaccuracies and to prepare his/her defence.