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Whistleblowing Policy

SUMMARY

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Definitions

Whistleblowing is ‘making a disclosure in the public interest’ and occurs when a somebody raises a concern about danger, impropriety or illegality that affects others, for example colleagues or members of the public.

Retaliation refers to any direct or indirect detrimental action recommended, threatened, or taken towards an individual who has reported misconduct, corruption or real or suspected child abuse, and/or provided information concerning the same.

When established, retaliation in itself constitutes **misconduct**, for which appropriate action will be taken.

Good faith is when a complaint is made with honest intention and without mischievous reasons or reasons to hurt.

Barnfonden representatives refers to all employees, Board members, interns and volunteers, partner organizations, consultants, and contractors who in any way represent Barnfonden in Sweden or abroad.

Statement of Purpose

Barnfonden is committed to the highest standards of ethical, moral, and legal business conduct as well as highest possible standard of openness, morality, and accountability. In line with this commitment and Barnfonden's commitment to open communication, this Policy aims to provide an avenue for Barnfonden's representatives and the wider public to raise concerns and complaints.

- The policy intends to reassure that complainants can raise concerns without fear of, and protected from, reprisals, subsequent discrimination, disadvantage, or victimization for whistleblowing. It is intended to encourage and enable Barnfonden's employees, Board members, volunteers, interns, partner organizations, consultants, and contractors and the wider public, including those who participate in Barnfonden's programmes, to raise serious concerns. Barnfonden recognizes that most cases will need to proceed on a confidential basis, but that this policy should provide reassurance to the complainant and the accused that the situation will be managed in the manner outlined in this policy and related procedures (as described in the Action Manual and Complaints Procedures).

Scope

This policy relates to all Barnfonden's operations and regards all employees, Board members, interns and volunteers, partner organizations, consultants, and contractors who in any way represent Barnfonden in Sweden or abroad. It is a mechanism available to any of the aforementioned or to any member of the public, who wishes to raise a concern or complaint against the organisation or an individual associated with the organisation.

Concerns and complaints may include but are not limited to:

- Barnfonden's accounting, auditing and internal controls practices and procedures.
- Matters involving harassment, unsafe practices, exploitation, victimization, child abuse or other inappropriate behavior towards a child.
- Misconduct by employees, or other inappropriate behavior by Barnfonden's Board, employees, interns, volunteers, partner organizations, contractors, consultants, or contractors.
- Money laundering and financing of terrorism.
- Bribery or any form of corruption.
- Retaliation, victimization, or harassment for raising complaints or concerns.

Position on Whistleblowing

Harassment and victimization

Barnfonden will not tolerate retaliation, harassment, or victimization against its Board, employees, volunteers, interns, consultants or contractors, or any member of the public, Partner, or project/programme participant, for reporting concerns or complaints in good faith.

Barnfonden recognizes that the decision to report a concern can be difficult. Barnfonden's position is that all complaints are based on the truth and that those who raise the complaint should have nothing to fear.

Confidentiality and security

All concerns raised and the procedures for the submission of complaints shall be confidential, according to the process outlined in this document. Every effort will be made to retain the anonymity of the persons raising a complaint. Security issues will always be considered and Barnfonden will not endanger the security of any person in the process.

Untrue complaints

If a complaint is made in good faith, but it is not confirmed by the investigation, no action will be taken against the accused. If it is proven that a representative of Barnfonden makes a complaint that is intentionally false or misleading, with bad intention or for personal gain, then this may result in disciplinary or other appropriate actions. The transmission or dissemination of unsubstantiated rumors is not a protected activity.

Prevent and detect

Barnfonden has a responsibility to prevent and detect any misconduct against Barnfonden's policies and procedures. The preventing measures include:

- i. Barnfonden's Code of Conduct and related policies and procedures.

All representatives contracting to Barnfonden must sign a Code of Conduct. The Code of Conduct is strict and specifically mentions that employees and persons that represent or sign a contract with Barnfonden should not be associated with unethical and criminal activities.

- ii. Awareness among Barnfonden's representatives through information sharing and trainings.

Barnfonden's Whistleblowing Policy is shared with all representatives of Barnfonden so they will be informed of Barnfonden's whistleblowing process and procedures. It is also available to the wider public on Barnfonden's website and is referred to in key documents produced by the organisation, such as the Annual Report and magazine. All project partners are required to have child-friendly reporting mechanisms activated at community level that respond to this policy or Barnfonden-approved local policies that meet or exceed our own policy. Barnfonden works actively to create an open working environment and communication. It is important to build trust and to create a culture of transparency and accountability among co-workers and external stakeholders, including children, to prevent misconduct.

- iii. Preventing and detective measures.
- iv. Barnfonden shall take all appropriate steps, and comply with all applicable laws and regulations, to prevent and detect misbehaviors related to the Board, employees, volunteers, interns, consultants, or contractors of Barnfonden. Barnfonden will also take all appropriate steps to prevent retaliation against those who submit a complaint. Barnfonden has an inbuilt system of preventative and detective measures to minimize the risk of any misbehavior, corruption, aid diversion, exploitation, or other criminal activity in relation to Barnfonden's operations. Among these measures are regular and systematized monitoring on activity implementation and financial management, organizational assessment, audits, trainings, internal control system, financial and administrative systems, and governance. These measures are further described in all to this policy's related documents (see below).
- v. Whistleblowing mechanism

Anyone who is acting on behalf of Barnfonden is obliged to immediately report any suspected case of misbehavior towards our Codes of Conduct or suspicion of retaliation. It is encouraged to contact the closest manager who in turn will notify Barnfonden's Secretary General. Suspicions can also be confidentially and anonymously reported through Barnfonden's [Whistle Blowing Mechanism](#). This Mechanism is also the most appropriate channel for use by the wider public.

Respond

It is Barnfonden's duty to respond to this policy and all persons acting on behalf of Barnfonden to respond to and report on any concerns or suspicion of misconduct or retaliation. The protection against retaliation applies to all representative of Barnfonden who:

- Report the failure of a Barnfonden representative to comply with their obligations under Barnfonden's policies and procedures; this includes any request or instruction from any Barnfonden representative to violate Barnfonden's policies and procedures.
- Provide information in good faith on wrongdoing perpetrated by a Barnfonden representatives.

- Cooperate in good faith with an audit or investigation.

In order to receive protection under this Policy, the individual must:

- Make the report in good faith;
- Have a reasonable belief that the misconduct or irregularity has occurred.
- Report any retaliation as soon as possible and no later than 90 days after the alleged act of retaliation has taken place.

When complaints involve children

When a complaint involves a child, Barnfonden will respond in a manner which ensures children's or young persons' immediate and long-term protection and safety. Barnfonden will take positive steps to ensure the protection of children and will maintain a focus on the best interests of children.

When there are suspicions of abuse by a representative of Barnfonden, both the representatives and the children's rights are to be attended to. This means that the safety of the child is of first concern and that the representative must have access to legal and professional advice and support.

Barnfonden will not act alone; all suspected situations of child abuse will be referred to the relevant legal authority. If the police decide to undertake a criminal investigation, then that member of staff may be suspended, without prejudice, as a precautionary measure. It is important that no internal investigation is undertaken, and no evidence gathered that might prejudice the criminal investigation. If there is insufficient evidence to pursue a criminal prosecution, then a disciplinary investigation may still be undertaken if there is reasonable cause to suspect that abuse may have occurred.

The safety of the child will be the primary consideration; no person within Barnfonden will collude to protect an adult or an organization. The Secretary General must immediately ensure that the suspected individual does not have any contact with the child making the allegation. A risk assessment must be undertaken to determine what level of access, if any, that person should have, to other children. The allegation may represent inappropriate behavior of poor practice by a member of staff which needs to be considered under internal disciplinary procedures.

Responsibilities

Barnfonden's Representatives are all responsible to report any misconduct or wrongdoing in line with this policy and Barnfonden's Action Manual and Complaints Procedures; confidentiality clauses in employment and consultancy contracts do not preclude such reporting.

Any reports of suspected misconducts or wrongdoing in relation to this policy must be investigated. The responsibility to investigate and to report to the Board or to appropriate authorities lies mainly on the Secretary General. The Secretary General can delegate the responsibility according to the Action Manual and Complaints Procedures. All final decisions lie with the Board.

Depending on the outcome of the investigation, Barnfonden has the responsibility to take appropriate actions and make necessary reporting and logging according to Barnfonden's Action Manual and Complaints Procedures.

RELATED DOCUMENTS

- Action Manual and Complaints Procedures
- Report Form and Log of Cases
- Anti-corruption Policy
- Anti-terrorism and Money Laundering Policy
- Financial and administrative Manual
- Code of Conduct
- Child Safeguarding Policy
- Prevention of Sexual Exploitation, Abuse & Harassment (PSEAH) Policy