

Whistleblower Policy

May 2021

| Originally developed | Last update | Approved (and by whom) |
|----------------------|-------------|--|
| September 2020 | April 2021 | 6 November 2020 (Executive Committee) 25 May 2021 (Executive Committee) |

1. Introduction

Child Rights Connect requires staff, consultants, interns, volunteers and members of its Executive Committee (ExCo) to observe the highest standards of professional and personal ethics in the conduct of their duties and responsibilities. Such individuals must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations, human rights standards and organisational policies.

The purpose of this policy is to provide the organisational framework for encouraging and allowing any person to report suspected illegal practices, misconduct or violation of CRCnct's policies by staff, consultants, interns, volunteers and ExCo members. This policy sets out the reporting procedure for, and measures protecting, those reporting such allegations.

This policy supplements CRCnct's policies, particularly its *Anti-Corruption Policy*,¹ *Staff Rules and Regulations*, *Financial and Legal Policy and Procedures*, *Child Safeguarding Policy and Procedure*,² and applicable laws. CRCnct's Child Safeguarding Policy and Procedure sets out a tailored reporting procedure.

2. Scope

This policy applies to:

1. CRCnct staff, consultants, interns and volunteers;³
2. Members of the CRCnct Executive Committee;
3. Network members⁴ and partners⁵ of CRCnct;
4. CRCnct Service providers;⁶
5. CRCnct representatives⁷, or those who collaborate with CRCnct in specific activities, including children.

This policy has been approved by the CRCnct Executive Committee and operationalized by the Executive Director. It is meant to be reviewed every year by the ExCo with a view to ensure that it continues to meet evolving needs and circumstances.

¹ <https://www.childrightsconnect.org/wp-content/uploads/2021/08/crcnct-anti-corruption-policy.pdf>

² <https://www.childrightsconnect.org/wp-content/uploads/2021/08/crcnct-child-safeguarding-policy-procedure.pdf>

³ These are individuals who are engaged by CRCnct on any type of contract.

⁴ Organisations that are recognised as members of CRCnct under its Statutes.

⁵ Organisations who have a form of partnership with CRCnct to deliver specific activities e.g. donors, coalitions, other organisations that work with CRCnct but are not members or service providers.

⁶ Organisations or companies that have been contracted by CRCnct to deliver specific services e.g. IT maintenance.

⁷ Any individual who participates in activities and/or who comes into contact with children or has access to children's information through CRCnct e.g. journalists, celebrities, visitors.

This policy has been communicated to staff, consultants, interns, volunteers and Network members. **In line with principles of accountability and transparency**, this policy,⁸ the corresponding whistleblower reporting form,⁹ as well as the child-friendly versions (in different languages) of these documents¹⁰ have been published on CRCnct's website, to ensure that the whistleblowing principles, reporting mechanisms and protective measures are known, available and actionable to all.

3. Definitions

| Terms | Definitions |
|----------------------------|---|
| Suspected violation | A reasonably held belief that a CRCnct staff member, consultant, intern, volunteer or ExCo member has failed to comply with human rights standards, laws and regulations applicable to CRCnct, or CRCnct organisational policies. |
| Whistleblower | Any person reporting, in good faith, a suspected violation. |

4. Policy statement

Child Rights Connect is committed to complying with all relevant laws and human rights norms as well as to observe the highest standards of professional and personal ethics in conducting its work. CRCnct has **zero tolerance** for, and will act appropriately in response to, any conduct or behaviour contrary to these laws and standards or contrary to its organisational policies.

CRCnct is committed to encouraging full and safe disclosure of suspected violations of these laws, standards and policies, and endeavours to protect from adverse consequences those who make such disclosures.

5. Reporting responsibility

5.1 Whistleblowing responsibility

This whistleblower policy is intended to encourage and enable any person to report a suspected violation so that Child Rights Connect can address and correct improper conduct and action. It is the responsibility of all staff, consultants, interns, volunteers and members of the ExCo to report a suspected violation.

5.2 Acting in good faith

Any person reporting a suspected violation is expected to act in good faith and to reasonably believe that a CRCnct staff member, consultant, intern, volunteer or ExCo member has failed to comply with human rights standards, laws and regulations applicable to CRCnct, or CRCnct organisational policies.

If an employee, consultant, intern, volunteer or ExCo member raises allegations that prove to have been made maliciously, or knowingly to be false, this may give rise to disciplinary action.

6. Reporting procedure

In cases where a suspected violation concerns allegations of bribery, corruption, fraud or the existence of a conflict of interest, procedural steps additional to those set out below apply to the investigation of allegations (as set out in the CRCnct *Anti-Corruption Policy*).¹¹

⁸ <https://www.childrightsconnect.org/wp-content/uploads/2021/08/crcnct-whistleblower-policy.pdf>

⁹ <https://www.childrightsconnect.org/whistleblowing-form/>

¹⁰ <https://www.childrightsconnect.org/version-policies-everyone/>

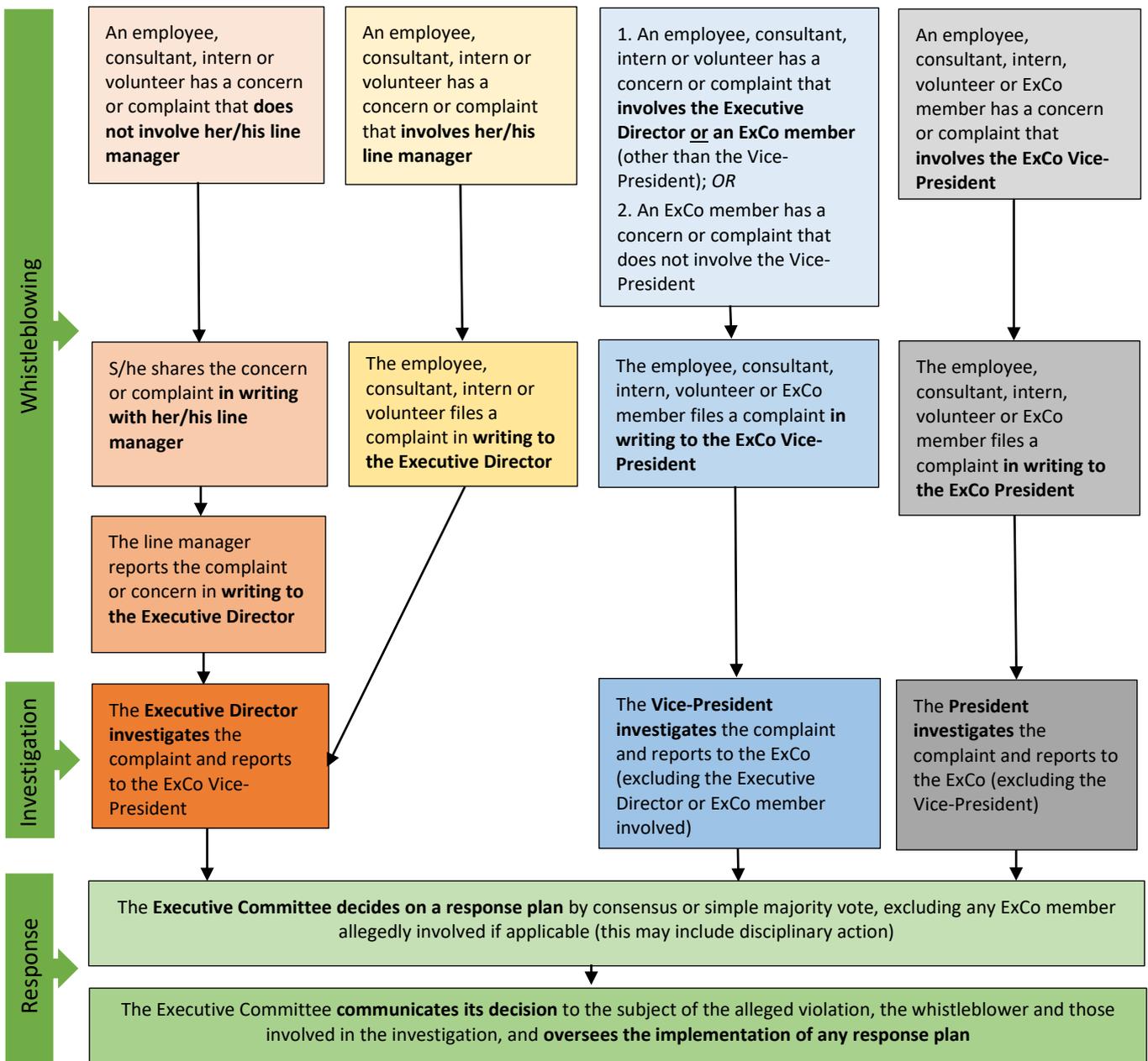
¹¹ <https://www.childrightsconnect.org/wp-content/uploads/2021/08/crcnct-anti-corruption-policy.pdf>

6.1 Internal procedure

Child Rights Connect endeavours to act with the utmost transparency as well as confidentially and respect for privacy. **Employees, consultants, interns or volunteers** should feel able to share questions, concerns, suggestions or complaints with their line manager. Line managers are required to swiftly report a suspected violation in the way depicted below. Allowing for anonymity where this is sought, an **online whistleblowing reporting form** has been established.¹²

Depending on the subject of a suspected violation, the **Executive Director or Vice-President or President** takes responsibility for investigating the matter and reporting to the full ExCo (excluding any ExCo member involved, if applicable). The **ExCo** (excluding any ExCo member involved, if applicable) is responsible for deciding on a response plan, communicating it to those involved, and overseeing its swift implementation.

The flowchart below summarizes the internal whistleblowing procedure:



¹² <https://www.childrightsconnect.org/whistleblowing-form/>

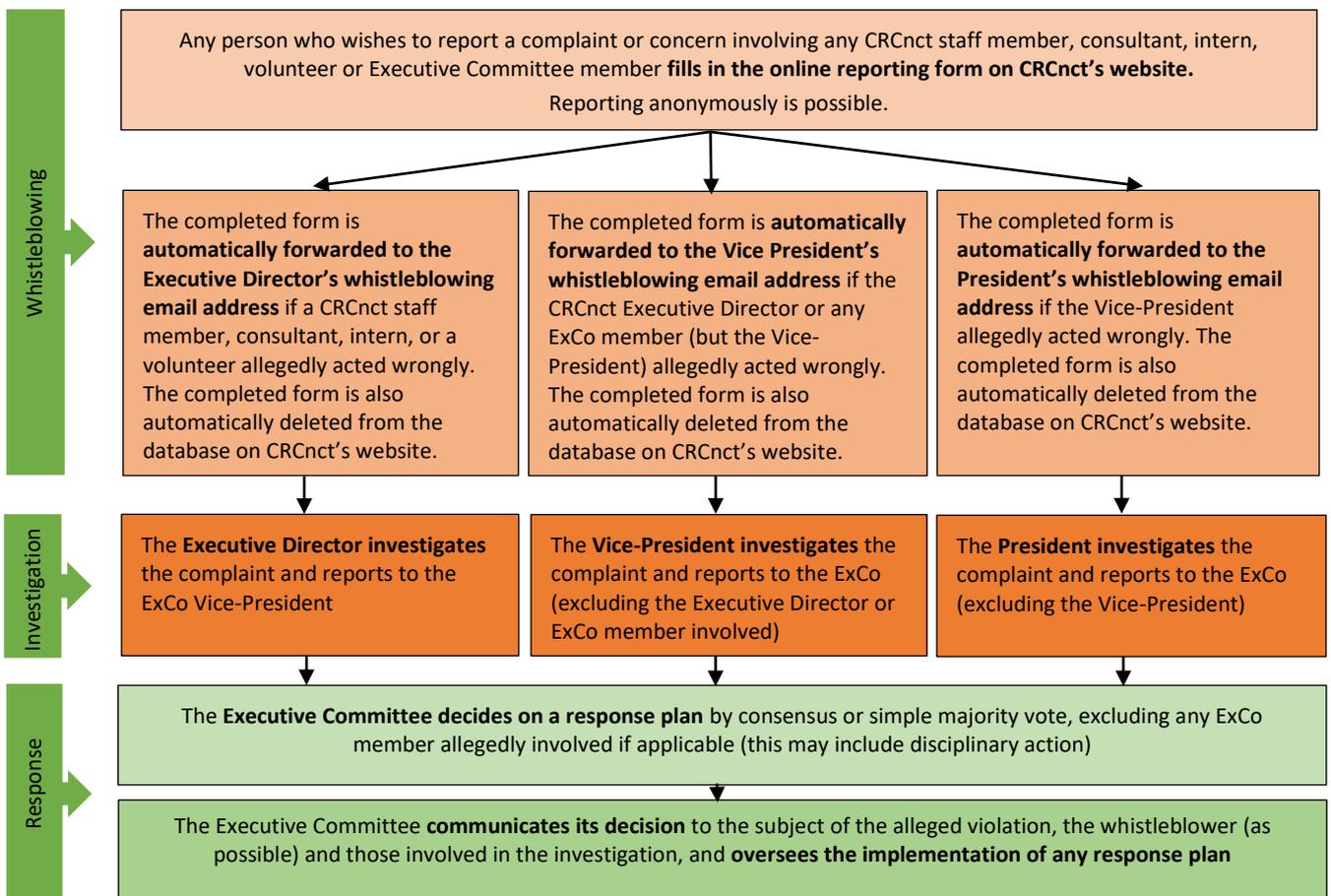
6.2 External procedure

CRCnct encourages **any person** to report a reasonably held belief that a CRCnct staff member, consultant, intern, volunteer or ExCo member has failed to comply with human rights standards, laws and regulations applicable to CRCnct, or CRCnct organisational policies. In such cases, the person is requested to **raise their concerns in writing through the dedicated whistleblowing reporting form on CRCnct’s website.**¹³

Reporting anonymously is possible through this form. The reporting form collects information on the alleged violation(s), including but not limited to its nature, who allegedly acted wrongly, what occurred and when, and how and when the person came to know about it, with a view to allow proper investigation and follow-up. Once submitted through CRCnct’s website, and depending on who allegedly acted wrongly, the report is automatically forwarded to the following responsible persons, with no copies stored on CRCnct’s website:

- The **Executive Director** of CRCnct (through this email address solely managed by the post-holder: EDwhistleblowing@childrightsconnect.org); **or**
- In the case where the suspected violation involves the Executive Director or a member of the ExCo, to the ExCo **Vice-President** (through this email address solely managed by the post-holder: VPwhistleblowing@childrightsconnect.org); **or**
- In the case where the suspected violation involves the ExCo Vice-President, to the **ExCo President** (through this email address solely managed by the post-holder: Pwhistleblowing@childrightsconnect.org).

The below flowchart summarizes the whistleblowing procedure through the online form:



¹³ <https://www.childrightsconnect.org/whistleblowing-form/>

Follow-up to a complaint

If a whistleblower does not hear back from one of the above-mentioned responsible persons within what s/he considers to be a reasonable time, s/he is encouraged to follow-up with:

- The **ExCo President** (through this email address: Pwhistleblowing@childrightsconnect.org) concerning any communication that relates to the Vice-President; **or**
- The ExCo **Vice-President** (through this email address: VPwhistleblowing@childrightsconnect.org) concerning any other communication.

6.3 Child-and everyone-friendly reporting process

In line with Sections 7, 8 and 9 of its organisational *Child Safeguarding Policy and Procedure*,¹⁴ CRCnct encourages **children and adults to report any incidents or concerns about a child's or group of children's safeguarding and safety involving any children collaborating with CRCnct or adults working with CRCnct.**

Beyond child safeguarding issues, children are also encouraged to **report any incidents or concerns about a suspected violation** as covered under this *Whistleblower Policy*, on an equal footing as adults.

To this effect, a child- and everyone-friendly version of this *Whistleblower Policy* and online reporting form have been developed and published on CRCnct's website.¹⁵ While these reflect the principles, standards and procedures under this policy, the design and language of these versions are more accessible to children and persons with visual impairment.

Below is an overview of the reporting process under the child- and everyone-friendly version of this *Whistleblower Policy*:

1. If the complaint concerns a staff member (other than the Child Safeguarding Focal Person) and/or an intern, volunteer, consultant, an adult who took part in an activity, a child who took part in an activity and any other person (other than the Executive Director or any member of the Executive Committee), then the complaint lodged through the online reporting system is automatically forwarded to the Child Safeguarding Focal Person for investigation.
2. If the complaint concerns the Child Safeguarding Focal Person, the complaint is automatically forwarded to the Executive Director for investigation.
3. If the complaint concerns the Executive Director and/or any member of the Executive Committee (other than the Vice-President), the complaint is automatically forwarded to the Vice-President for investigation.
4. If the complaint concerns the Vice-President, the complaint is automatically forwarded to the President for investigation.

If a child whistleblower does not hear back from one of the above-mentioned responsible persons within what s/he considers to be a reasonable time, s/he is encouraged to follow-up with:

- The Child Safeguarding Focal Person, (through this email address: safeguarding@childrightsconnect.org) concerning any communication excluding those that relate to the Child Safeguarding Focal Person; **or**
- The Executive Director (through this email address: EDwhistleblowing@childrightsconnect.org) concerning any communication that relates to the Child Safeguarding Focal Person.

¹⁴ <https://www.childrightsconnect.org/wp-content/uploads/2021/08/crcnct-child-safeguarding-policy-procedure.pdf>

¹⁵ <https://www.childrightsconnect.org/child-friendly-whistleblowing-form>

7. Protective measures

7.1 No retaliation

It is **contrary to the values of CRCnct for anyone to retaliate** against any person who in good faith reports a suspected violation.

An employee, consultant, intern, volunteer, ExCo member or Network member who retaliates against a whistleblower is subject to discipline up to and including termination of employment, consultancy or membership, or removal from the ExCo.

7.2 Confidentiality

Suspected violations may be communicated by a whistleblower with a request for confidentiality. Such communications will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

The online reporting form includes the possibility for a whistleblower to communicate anonymously. Either the phone number or an email address that does not contain the whistleblower's name or any other personal identifiers is asked through the online form for the necessary purpose of allowing an investigation into a complaint and/or inform the whistleblower of the outcome of the investigation.

7.3 Child safeguarding

The principle of the best interests of the child and all the child safeguarding measures foreseen under CRCnct's *Child Safeguarding Policy and Procedure* apply in all cases involving a child or group of children, either as whistleblower or person suspected of wrongdoing, as well as in all cases involving a child safeguarding issue, whether raised by a child or group of children, or adult(s).

8. Handling reports of suspected violations

8.1 Handling of individual complaints

Depending on the subject of the suspected violation, for both internal and external procedures, the **Executive Director or ExCo Vice-President or ExCo President** is responsible for ensuring that all reports of suspected violations are investigated and resolved.

The Executive Director or Vice-President or President, as appropriate, will acknowledge to the whistleblower receipt of the report.

All reports will be promptly investigated. If warranted by the investigation, the ExCo will decide any appropriate corrective action by consensus or simple majority vote, excluding any ExCo member who may be involved, if applicable. Corrective action may include disciplinary action.

The ExCo will communicate the outcome of the investigation and any corresponding corrective action to the subject of the alleged violation, the whistleblower and those involved in the investigation, and will oversee the implementation of any response plan.

8.2 Oversight of the handling of complaints

When a complaint is submitted through the online reporting form, an automatic notification of submission is sent to the whistleblowing email addresses of the Executive Director and Vice-President of the ExCo (as well as to the Child Safeguarding Focal Person in case the complaint has been lodged through the child-friendly reporting form). This notification only contains an automatically generated reference number, the date of the submission, and the person who has received the complaint. It does not include any other information. This mechanism is established with the sole purpose of ensuring proper oversight of the existence and handling of complaints.

The **Bureau of the Executive Committee**, composed of the ExCo President, Vice-President, Treasurer and Secretary is responsible for monitoring, at least on a quarterly basis, the existence and handling of submitted complaints. In addition to monitoring the existence of complaints, the Bureau will ensure that those responsible for handling them have taken steps, or are in the process of doing so, to properly investigate and resolve these complaints.

In line with the principle of confidentiality, discussions within the Bureau will not include the name or any other personal identifiers of the whistleblower, should these be known.

9. Monitoring, reporting and review

On an annual basis, the Executive Director will review this policy, suggest necessary modifications to the ExCo, and provide the ExCo with an update on implementation of the policy. The ExCo is responsible for approval of any modification(s) to the policy. Any substantial changes to the policy will be communicated to Network members during or around the yearly General Assembly, as relevant. Any updates to the policy will be published on Child Rights Connect's website.

Staff, consultants, interns and volunteers will be required to sign that they understand and will comply with this policy – including as part of an induction programme, where applicable – and will be briefed on revisions to the policy, additional to annual staff training on the policy.

On an annual basis, the Executive Director will communicate to CRCnct's core donors a brief overview of the implementation of this policy, outlining the number and nature of complaints filed, their outcome, and the number and nature of complaints under review. In line with the principle of confidentiality, these annual reports will not contain any name or other personal identifiers.