

Guidelines on whistleblowing within Save the Children Norway

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Whistleblowing within Save the Children

Save the Children strives for an open culture where it is natural to raise concerns in the regular day-to-day dialogue without this being regarded as 'whistleblowing'. Anyone associated with Save the Children should feel able to raise both minor and major concerns with their manager or contact person in the organisation. This helps to ensure that problems are addressed and resolved at the lowest appropriate level.

In practice, whistleblowing should therefore be seen as a 'safety valve' which is set off in cases where concerns are not, or cannot be, satisfactorily dealt with in the regular dialogue. When concerns are raised, whether in the regular dialogue or by way of whistleblowing, Save the Children will support and protect the person who has reported the matter and the person(s) suspected of wrongdoing.

The purpose of Save the Children Norway's whistleblowing guidelines is to describe how to raise concerns with Save the Children and how the organisation receives and follows up such reports. The guidelines also set out the rights and obligations related to whistleblowing.

1. What is whistleblowing?

Whistleblowing means reporting to Save the Children on suspected wrongdoing in the organisation.

The purpose of whistleblowing is to ensure that such concerns are reported to Save the Children so the organisation can investigate and remedy the situation.

2. Who can report concerns?

Everyone employed within Save the Children Norway has the right to raise concerns; see [Norwegian Working Environment Act, Section 2-4 first paragraph](#).

Where relevant, the guidelines also apply to members of Save the Children Norway, both volunteers and elected officials, consultants, sub-contractors and members of Press – the youth organisation for Save the Children Norway.

Persons or groups working with Save the Children can also raise concerns.

3. What can I raise concerns about?

Suspected wrongdoing is defined quite broadly and includes all breaches or suspected breaches of applicable laws, regulations, guidelines or other relevant standards.

This includes violations of Save the Children's Code of Conduct and Child Safeguarding Protocol. These cover matters such as discrimination, harassment and other improper behaviour, abuse of power and position, financial misconduct, corruption and violations of children's safety and security.

Save the Children does not require the whistleblower to prove the truth of the allegation or that there has been any wrongdoing. It is sufficient to raise the concern in good faith and in a responsible manner. Save the Children will then investigate whether the concern relates to possible wrongdoing, and whether it should be treated as whistleblowing, a breach of the rules, a professional disagreement or an HR matter.

4. Am I entitled and obliged to raise concerns?

Employees have the right to report suspected wrongdoing in the undertaking; see [Working Environment Act, Section 2A-1](#).

In certain situations, employees also have an obligation to report; see [Working Environment Act, Section 2-3](#). This applies to matters that could endanger life and health, matters related to harassment or discrimination in the workplace, and matters related to personal injury or illness that the employee believes to be caused by the job or by conditions in the workplace.

Save the Children generally prefers employees to raise concerns in the regular day-to-day dialogue, and for whistleblowing to act as a 'safety valve' which is set off in cases where concerns are not, or cannot be, satisfactorily dealt with in the ongoing dialogue.

If you are associated with Save the Children Norway in some way other than employment, then under Norwegian law, you have neither the right nor the obligation to raise concerns, but Save the Children is also happy to hear from people who are not covered by the Working Environment Act.

5. What are the requirements for whistleblowing?

The [Working Environment Act, Section 2A-1](#) stipulates that anyone reporting a concern must proceed responsibly. According to the Act, the employer bears the burden of proof that the concern has not been reported in a responsible manner.

6. How and to whom do I raise concerns within Save the Children?

Reports to Save the Children should preferably be made in writing. Save the Children does not require anyone to report in a certain way or to a particular person, but recommends raising concerns as described in these guidelines to ensure that they are addressed in the best possible way.

6.1. Employees

As a rule, employees should address their concerns to the whistleblowing manager at alert@reddbarna.no. Only the whistleblowing manager has access to this e-mail account.

If the whistleblower judges or believes there is reason to assume that the concern will not be satisfactorily handled by the whistleblowing manager, the matter may be escalated to the Secretary-General of Save the Children Norway or the chair of the executive board.

It is also possible to notify the trade union or the safety representative – however, they must then forward the report to Save the Children's whistleblowing manager or general management in an appropriate manner, to enable the organisation to follow up on it.

Persons who receive a report within Save the Children Norway must follow the organisation's guidelines on whistleblowing.

6.2. Other people associated with Save the Children

Elected officials, members and volunteers, and other partners of Save the Children Norway should normally notify their contact person within the organisation. The contact person will then help them to bring the matter to the attention of the whistleblowing manager.

Where it is not desirable or possible to raise concerns via your contact person, the matter may be reported directly to the whistleblowing manager for Save the Children. Contact Information:

Channel	Contact Information
E-mail	alert@reddbarna.no
Tel.	+47 22 99 09 00 Ask the switchboard to put you through to the whistleblowing manager in the Secretary-General's office.
By post	Varslingsansvarlig (whistleblowing manager) Generalsekretærens stab Redd Barna Postboks 6902 St. Olavs plass 0130 Oslo, Norway

6.3. External notification channels

It is also possible to notify the supervisory authorities or other public authorities (the Norwegian Labour Inspection Authority, the Norwegian Data Protection Authority, the police, child welfare services, etc.)

7. What should a report contain?

Reports may be submitted in writing or orally, but people are encouraged to raise concerns in writing. The report should be as detailed as possible and should ideally include:

- Name (unless the matter has been raised anonymously)
- Reporting date
- What has been observed/experienced
- Time span (date and time of the observation/experience)
- Where the incident/action took place
- Any witnesses
- Any knowledge of previous cases involving the same person(s)
- Any documentation of the matter

If a report does not contain the information contained in these bullet points, Save the Children will attempt to obtain this information early in the process.

It is possible to raise concerns with Save the Children anonymously, but you are encouraged to declare your identity because it is more difficult to follow up on anonymous reports. Actions taken on the basis of anonymous reports are treated like other types of report, but it will not be possible to provide feedback to the whistleblower.

8. What principles apply to handling whistleblowers within Save the Children?

All reports should be dealt with without undue delay and respectfully, thoroughly and correctly.

All matters should be handled in confidence. The identity of the whistleblower, the subject(s) of the alert and the other details of the case must not be disclosed to more people than necessary.

Whistleblowing cases should be documented in a proper manner and in line with the applicable legislation and Save the Children's own rules.

Impartiality should be assessed according to the rules set out in Save the Children's statutes. In case of doubt as to impartiality, the person concerned should not assist in handling the report.

When a concern is raised, Save the Children, preferably the whistleblowing manager and the appointed administrator, will always hold an initial discussion with the whistleblower and the subject(s) of the report. The whistleblowing manager and the responsible line manager will then decide how the case should be handled.

8.1. Safeguarding and following up on the whistleblower

Save the Children will safeguard the whistleblower. The whistleblowing manager should ensure that the person raising the concern receives confirmation that the report has been received. The person who has raised the concern should receive satisfactory feedback within a reasonable time, with details of how Save the Children intends to follow up on the report. The person who raised the alert should normally be told who has or will have knowledge of the report.

Whistleblowers have the right to present their side of the case. Whistleblowers may use an advisor or support person in meetings about the report.

Whistleblowers should be informed of progress. The person who raised the concern should be informed when the case has been closed, including cases where it is concluded that there are is nothing to suggest any wrongdoing.

Where necessary, Save the Children can offer psychosocial assistance and support to the parties in a whistleblowing case.

8.2 Safeguarding and follow-up on the subject(s) of the report

Save the Children will safeguard the person(s) concerned in the report, referred to below as the *subject(s)*. Subjects should be informed of the report and receive satisfactory information on how Save the Children intends follow up on the matter. This also applies in cases where it turns out, after initial inquiries, that the report arises out of a misunderstanding or does not involve any wrongdoing. Subjects will generally be told who has, or will receive, knowledge of the report.

Subjects have the right of access to the allegations of wrongdoing and to other personal data collected about them. They also have the right to put their side of the case and must be given reasonable time and opportunity to make a statement and answer any accusations (the 'right of reply'). Subjects have the right to use an advisor or support person in meetings about the report.

Subjects must be informed of progress. Subjects should be notified when the case has been closed, including cases where it is concluded that there is nothing to suggest any wrongdoing.

Where necessary, Save the Children can offer psychosocial assistance and support to the parties in a whistleblowing case.

8.3. Where improper or criminal activity is detected

Where improper or criminal activity is detected, or where the organisation has reason to suspect this may have occurred, Save the Children will take matters further with the police, the child welfare services or some other public authority.

9. Are there limits to whistleblowing?

Rules on confidentiality apply to whistleblowing. This means that neither the whistleblower nor the subject(s) are allowed to breach the rules on confidentiality.

10. Do I take a risk by reporting my concern?

Save the Children will protect anyone who reports suspected wrongdoing against reprisals. For employees, reprisals are unlawful; see [Working Environment Act, Section 2A-2 \(1\)-\(3\)](#).

11. How does Save the Children report on whistleblowing?

Save the Children's whistleblowing manager is responsible for ensuring that all reports are documented in line with the guidelines on whistleblowing within Save the Children Norway. The status of the case, findings and actions taken should also be logged.

Save the Children's executive board and control committee will be presented with the whistleblowing log at their meetings (the log does not contain confidential information or details from individual cases) to allow Save the Children's handling of reports to be monitored. The Secretary-General of Save the Children Norway is kept informed of reports.

12. Can I appeal against the handling of a whistleblowing case?

Save the Children's control committee is the appeal body for issues concerning whistleblowing. The committee's remit in appeal proceedings is to review Save the Children's handling of the case and, in case of irregularities, it may call for the case to be revisited. The committee is not mandated to make decisions in a whistleblowing case.

To submit a complaint to the control Committee, send a written appeal to alert@reddbarna.no or contact the chair of the control committee directly. You can obtain contact details for the chair of the control committee by telephoning Save the Children Norway on +47 22 99 09 00 or by e-mailing giverservice@reddbarna.no.

13. Handling of personal data

Save the Children's handling of personal data is described in our Privacy Policy. The handling is in line with the rules on data protection.

If you have any questions or comments on the guidelines, please contact us via alert@reddbarna.no.