

Whistleblowing Policy for Save the Children Norway

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The original version of this Policy is the Norwegian version. If there are any significant differences between the original and the English translation, the Norwegian version is leading as it is the approved version by the Executive Board of SCN.

Whistleblowing within Save the Children Norway

Save the Children Norway (SCN) 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 SCN 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' that is used in cases where concerns are not, or cannot be, satisfactorily dealt with in the regular dialogue. When concerns are raised, whether through regular dialogue or by way of whistleblowing, SCN will safeguard and protect the people who have reported the matter and the people suspected of censurable conditions.

SCN encourages people to report censurable conditions and behaviours that are not, or cannot be, satisfactory dealt with in the regular dialogue. The purpose of Save the Children Norway's Whistleblowing Policy is to describe how to raise concerns with SCN and how the organisation receives and follows up such reports. The Policy also set out the rights and obligations related to whistleblowing.

The Policy is developed as part of SCN's systematic health, environment and safety work and in collaboration with employees and their elected representatives, see the Norwegian Working Environment Act, [Section 2 A-6, paragraph 2](#).

1. What is whistleblowing?

Whistleblowing, or notification, means reporting to SCN on suspected censurable conditions in the organisation.

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

2. Who can report concerns?

Employees of SCN and people hired from temporary-work agencies by SCN have the right to raise concerns; see [Norwegian Working Environment Act, Section 2-2 and 2A-1](#).

Members of Save the Children Norway, volunteers and elected officials, consultants, sub-contractors and members of Press – the Youth Organisation for Save the Children Norway can also raise concerns. This includes children who are in contact with Save the Children Norway.

3. What can I raise concerns about?

Censurable conditions refer to conditions that conflict with rules, Save the Children Norway's Code of Conduct and other ethical norms broadly accepted in the society.

Censurable conditions include violations of Save the Children Norway's Code of Conduct and Safeguarding Policy covering matters such as discrimination, harassment and other improper behaviour, abuse of power and position, financial misconduct and corruption, unsafe working environment, breach of personal data security and violations of child safeguarding.

SCN does not require the whistleblower to prove the truth of the notification or that there has been any censurable condition. It is sufficient to raise the concern in good faith and in a responsible manner. SCN will then investigate whether the notification concerns censurable conditions and if so, what the outcome of the investigation will be.

Censurable behaviour or conditions might have consequences for the employee or the partner of SCN. For employees the consequences can for example be suspension, dismissal or oral/written warning. For volunteers, members and trustees it can for example be relevant with suspension or exclusion. For consultants and sub-contractors, it can for example be relevant with termination of the contract or agreement.

4. Am I entitled and obliged to raise concerns?

Employees have the right to report suspected censurable conditions; see [Working Environment Act, Section 2 A-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.

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

5. What are the requirements for whistleblowing?

Notices can always be submitted internally, either by the whistleblower or through a Safety Representative, Employee Representative or a Lawyer, see [The Working Environment Act, § 2 A-2](#).

Employees can also raise a concern externally to the media or the Norwegian Public if a) the employee is acting in good faith with regards to the content of the notification, b) the notification concerns matters worthy of criticism that are in the public interest, and c) the employee has first notified internally, or has

reason to believe that internal notification will not be appropriate. The employer has the burden of proof when it comes to notifications in violation of the [Working Environment Act § 2 A-1 and 2 A-2](#).

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

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

6.1. Employees

As a general 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 means 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 a Department Manager, the CEO or the Chair of the Executive Board of Save the Children Norway.

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

6.2. Other people associated with Save the Children Norway

Elected officials, members and volunteers, consultants, suppliers, members of Press – SCN youth and children who have involvement with SCN 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.

If it is not desirable or possible to raise concerns via your contact person, the matter may be reported directly to SCN's Whistleblowing Manager. The contact information is:

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 CEO's Office.
By post	Varslingsansvarlig (Whistleblowing Manager) CEO's Office Redd Barna Postboks 6902 St. Olavs plass 0130 Oslo Norway

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 is 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, SCN will attempt to obtain this information early in the process.

It is possible to raise concerns with SCN 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 Norway?

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

The principle of contradiction/adversarial proceedings will be fundamental in handling the notification so that SCN does not consider a case without all the parties having had the opportunity to oppose the other person's presentation of the case.

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 SCN's own procedures and regulations, see part 13 in this document for information about handling of personal data.

Impartiality should be assessed according to the rules set out in SCN's Statutes and the Norwegian Public Administration Act. In case of doubt as to impartiality, the person concerned shall not assist in handling the report.

When a concern is raised, SCN, preferably the Whistleblowing Manager and an appointed administrator, will if possible 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 whether the case shall be handled as a notification and how it should be followed up.

8.1. Safeguarding and following up on the whistleblower(s)

SCN shall safeguard the whistleblower(s). The Whistleblowing Manager should ensure that the person(s) raising the concern receives confirmation that the report has been received and as a main rule receive information when the case has been finalised.

Whistleblowers have the right to present their side of the case. If the case involves critique/a notification against the whistleblower, the whistleblower must be given sufficient time to give his/her explanation of the case, see the contradiction principles.

Whistleblowers may use an advisor or support person in meetings and communication about the notification.

Where necessary, SCN 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

SCN will safeguard the person(s) concerned in the report, in this document referred to as the *subject(s)*. Subjects should as a main rule be informed of the notification and how SCN will follow up on the matter.

Subjects must be informed of progress. Subjects should be notified when the case has been closed, including cases where it is concluded that the notification does not involve any censurable conditions. Subjects will generally be told who has, or will, received knowledge of the report.

Subjects 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 also have the right of access to the allegations of censurable conditions and to other personal data collected about them.

Subjects have the right to use an advisor or support person in meetings and communication about the report.

Where necessary, SCN 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, SCN will take the matters further with the police and when necessary also to other public authorities, such as the child welfare services.

9. Are there limits to whistleblowing?

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

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

SCN will protect anyone who reports suspected censurable conditions against reprisals. Reprisals towards employees are unlawful; see [Working Environment Act, § 2A-4](#).

11. How does Save the Children Norway report on whistleblowing?

SCN's Whistleblowing Manager is responsible for ensuring that all reports are documented in line with the Whistleblowing Policy for Save the Children Norway. The status of the case, findings and actions taken should also be logged.

Save the Children Norway's Executive Board and Control Committee will be informed about whistleblowing at their meetings (the information does not contain confidential information or details from individual cases) to monitor SCN's follow-up of whistleblowing. The CEO of SCN is kept informed about whistleblowing.

If a notification will affect donors, SCN will inform the donor in accordance with the donor's regulations. SCN's information will not include confidential information or details from cases and the information will be anonymised.

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

SCN's Control Committee is the appeal body for issues concerning whistleblowing. The Committee's remit in appeal proceedings is to go through and review SCN's handling of the case and, in case of irregularities, the Committee may call for the case to be reviewed. 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 SCN on +47 22 99 09 00 or by e-mailing post@reddbarna.no.

13. Handling of personal data

SCN's handling of notice of censurable conditions involves the processing of personal data. The purpose of the processing of data is to examine notices of censurable conditions and to rectify such conditions.

When processing notices about our employees and hired workers the legal basis for the processing is GDPR article 6 letter c (the processing is necessary to fulfill a legal obligation incumbent on Save the Children Norway). When processing notices about members, volunteers, trustees and other partners of Save the Children Norway, the legal basis is GDPR Article 6 letter f (Save the Children Norway's legitimate interest in processing notices of censurable conditions.)

Personal information in a notice is stored and processed confidentially. As a general rule, the personal information is deleted after 5 years after the case was closed, unless special circumstances make it necessary to keep the information longer (in which case this must be justified). For more information on the processing of personal data, please refer to [Save the Children Norway's Privacy Notice](#).

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