

Title:	WHISTLEBLOWING POLICY
Policy statement:	<p>Tearfund Netherlands, hereafter referred to as “Tearfund”, is committed to maintaining the highest standards of openness, probity and accountability in keeping with our values of being Christ-centred, truthful, courageous, compassionate and servant-hearted. An important aspect of accountability and transparency is a mechanism to enable staff and other people associated with Tearfund to voice concerns in a responsible and effective manner.</p> <p>When someone discovers information which they believe shows serious malpractice or wrongdoing within Tearfund then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of management. The process for doing this is outlined in the whistleblowing procedure.</p>
Procedures and other policies which relate to this policy:	<ul style="list-style-type: none"> ● Procedure for whistleblowers ● Personal Conduct policy or Code of Conduct ● Safeguarding policy ● Fraud, loss and bribery policy ● Conflict of Interest policy ● Partner complaints process (as set out in the Partnership Agreement)
Why the policy is needed:	<p>De Wet Huis voor Klokkenuiders of April 14, 2016, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. Tearfund has developed this policy and the associated procedure to ensure that no members of staff or others should feel at a disadvantage in raising legitimate concerns.</p> <p>Tearfund also recognises that there may be occasions where external stakeholders wish to report serious legitimate concerns of a whistleblowing nature, which relate to serious malpractice or wrongdoing within Tearfund which are in the public interest, anonymously rather than through the normal reporting channels and this policy also provides for this.</p>
Who must follow this policy:	<p>Tearfund staff, supervisory council members, consultants, contractors, interns, and volunteers must follow this policy. It is mandatory for all staff to complete the e-learning training on whistleblowing annually.</p> <p>For external stakeholders such as members of the communities we serve, supporters, donors, members of the public and those who have a connection with Tearfund, concerns of a whistleblowing nature can be raised anonymously via the whistleblowing e-mail directly, or through Safecall - an independent service - details in Section 4 of the policy. Details are set out on Tearfund’s website.</p> <p>For partners, the procedure for partner feedback, disagreements and complaints is contained in the General Conditions (section 10.2). Partners may also contact Tearfund directly through the whistleblowing e-mail or using Safecall if they are concerned about serious malpractice, unacceptable practice or wrongdoing and wish to raise this concern anonymously.</p>

Keywords:	Whistleblowing, complaint, concern, malpractice, unacceptable fundraising practices, theft, illegal, abuse, exploit, fraud, bribery, crime, human trafficking, wrongdoing, corrupt, personal conduct, vertrouwenspersoon
Person responsible:	HR Director
Version/approved by:	Final approved by ET, December 2022
Next formal review:	December 2025

Whistleblowing procedure

1. What is Whistleblowing?

Whistleblowing is the disclosure of a concern that is in the public interest, relating to specific malpractice or wrongdoing.

The concern raised should relate to a specific malpractice or wrongdoing by a Tearfund staff member, consultant, contractor, volunteers, intern, supervisory council member or partner's staff, where Tearfund has a direct control over the possible solution. The list below shows the types of malpractice or wrongdoing that should be reported; however this is not an exhaustive list.

- **fraud/theft or bribery** has, will or is likely to take place
- a person has, will or is likely to **abuse or exploit** another person (Child or Vulnerable Adult/adult at risk - Safeguarding policy) e.g. sexual or physical abuse
- a person has, will or is likely to engage in or facilitate the **human trafficking** of another person
- any other **criminal or illegal activity** has, will or is likely to take place
- the organisation or a person within the organisation has, will or is likely to engage in unacceptable fundraising practices
- a person has, will or is likely to **endanger the health and safety** of another person or the environment.
- a person has, will or is likely to **corrupt/abuse an organisational practice/procedure** e.g. within an operational programme - the HR, Finance or Logistics may corrupt/abuse a practices and/or procedures
- a person has, will or is likely to do **something illegal** e.g. breach of contract, negligence, damage/misuse company property.
- a person has, will or is likely to **behave in a way that is not in line** with Tearfund policies such as the Personal Conduct policy/the Code of Conduct or Tearfund's values.
- a person has, will or is likely to **victimise another person** e.g. the use of a person's position or authority within Tearfund to abuse/victimise another person.

Safeguarding concerns:

Please note that if your concern relates to the abuse or exploitation of a child or adult at risk e.g. sexual or physical abuse, you should report it to safeguarding@tearfund.nl using [Tearfund's Safeguarding Policy](#) to guide you.

Other complaints and grievances:

If your complaint relates to your own personal circumstances, such as the way you have been treated at work, the staff member can contact the HR Director or Vertrouwenspersoon: vertrouwenspersoon@tearfund.nl.

If you are uncertain whether something is within the scope of this policy, please contact the Whistleblowing Team for advice by sending an e-mail to whistleblowing@tearfund.nl.

2. Confidentiality of the whistleblower

All concerns will be managed confidentially as far as possible. That means all information on the matter, including the identity of individuals concerned, will only be shared where necessary with the relevant whistleblowing investigation team.

We aim to create a culture that enables employees to speak up about issues that concern them before they escalate, and to do so with the comfort of knowing they will be listened to and not punished. Anonymous reports can make an investigation more difficult or impossible because it is not possible or more difficult to establish whether the allegations are credible. Therefore, Tearfund encourages whoever is raising a concern to provide a contact name and telephone number or email address. If it is necessary for those investigating your concern or others (such as the police) to know your identity, we will discuss this with you.

We expect staff to respect the internal investigation process and keep all information about their concerns confidential. If a staff member has a concern about how the concern is being dealt with, they should contact the HR director, or contact the Tearfund confidential person at vertrouwenspersoon@tearfund.nl.

3. Protection for the person/s 'blowing the Whistle'

The 'Wet Huis voor klokkenluiders' (2016) protects workers from detrimental treatment or victimisation from their employer if, in the public interest, they blow the whistle on wrongdoing.

There must be no fear of punishment or unfair treatment (e.g. dismissal, victimisation or any other detrimental treatment as result of whistleblowing) from anyone at Tearfund. Tearfund will take disciplinary action against any staff member found to be in breach of this policy. However, people who 'blow the whistle' should make sure that the information provided is substantially true and is an honest explanation of the concern.

If someone makes an allegation that they reasonably believe to be true, which is not confirmed by subsequent investigation, no action will be taken against that person. In making a disclosure a person should be careful to ensure the accuracy of the information. If, however, it is found that a person made a malicious or vexatious allegation which is found to be untrue or is in any way personally involved in the malpractice, wrongdoing or omission, disciplinary action may be taken against them.

4. How to report your concerns

We hope that in many cases staff members will be able to raise any concerns informally with

their team lead or through HR by telling them in person or putting the matter in writing if preferred. It may be possible to resolve your concern quickly and effectively without the need for further action. However, where the concern is more serious and is related to one of the matters defined as Whistleblowing in section 1 above, or you feel that your team lead or HR has not addressed your concern, or you prefer not to raise it with them for any reason, you should raise your concern using one of the following options:

Whistleblowing e-mail:

Send your concern to this e-mail address: whistleblowing@tearfund.nl, which is monitored by the Vertrouwenspersoon and the Safeguarding Focal Point.

Or

Whistleblowing phone number:

Phone this number from Safecall, a totally independent organisation working for Tearfund UK and Tearfund Netherlands, and state your concern: +44 (0)800 915 1571. If you call this number, a Dutch translator should be available.

In your e-mail/message please clearly state the facts and details of the concern. If the report involves a child or vulnerable adult/adult at risk, do not disclose their specific names or details in the initial report. Tearfund will follow up requesting further details if needed.

If the concern is about the CEO of Tearfund Netherlands, the Vertrouwenspersoon will inform the chairman of the Supervisory Council (you can still use the same address: whistleblowing@tearfund.nl).

If the concern is about a member of the Supervisory Council, call Safecall or use the following e-mail address: whistleblowing@tearfund.nl. In this case the Safeguarding and Wrongdoing Committee will be informed without members of the Supervisory Council.

If you do not have access to a computer, you should raise your concern with the most senior member of staff in your specific location. Should your concern involve the most senior member of staff in your specific location, then you should inform another senior member of staff. This member of staff should pass the concern in an email as soon as possible to whistleblowing@tearfund.nl.

5. Next steps

Concerns received by e-mail or by phone will be sent to the Vertrouwenspersoon who will then decide how the concern will be followed up. If the Vertrouwenspersoon is absent, then the concern/report will be given to the Safeguarding Focal Point.

All concerns raised at Tearfund are taken seriously. Prompt steps will be taken to consider all concerns and when appropriate, an investigation into the allegations will be undertaken in line with the appropriate procedures. For example, if a concern relates to abuse or exploitation it will be investigated in accordance with Tearfund's Safeguarding Policy. If the concern relates to an allegation of fraud it will be investigated in accordance with Tearfund's Fraud, Loss and Bribery Policy.

Wherever possible, feedback on the results of any investigation will be given to the person

who initially reported the concern. However, if the malpractice or wrongdoing concern is of a confidential/private nature or the evidence uncovered is sensitive, then it may not be possible to provide feedback detailing the specific actions that were taken to resolve the concern. This would also include situations where an investigation has resulted in disciplinary action being taken. Giving specific feedback may therefore not always be appropriate and will be decided on a case by case basis.

6. Pastoral Support

A staff member who experiences feelings of anxiety, stress or fear as a result of ‘Blowing the Whistle’ can ask for Pastoral support. If you want Pastoral support, ask HR to arrange this.

7. PARTNER AND SUPPORTER COMPLAINTS

What to do if a partner has a complaint

The procedures for partner feedback, disagreements and complaints are contained in the General Conditions of the Project agreement, regarding the clauses on Disagreement, complaint, withdrawal. If a partner has a complaint about Tearfund and can't get satisfaction from the Country or Geographical Cluster Lead, then they should contact the CEO of Tearfund Netherlands or use the address whistleblowing@tearfund.nl. This should take the form of a letter or email headed “Complaint Against Tearfund” describing the failure or issue.

The Geographic Head will provide an acknowledgement and explain the timeframe within which a response will be given. The Geographic Head will investigate the complaint and provide a clear response to the partner within one month. The Geographic Head will request acknowledgement of receipt of the response and acknowledgement that the partner has understood the response provided.

If resolution is not reached with the Geographic Head, the matter will be referred to the CEO and/or the Safeguarding and Wrongdoing Committee.

What to do if you are a supporter / donor and have a complaint

We have a dedicated Customer Service. They're friendly, knowledgeable and committed to helping you. Sharing your feedback with this team is the best way to make sure it gets to the right people. We want it to be easy for you to talk to us, and so you can share your feedback by sending an e-mail to: info@tearfund.nl or call this number: 030- 69 69 600. You can find out more about this on our website. Whichever way you choose, please remember to include your contact details if you'd like us to respond to you. If you know your supporter reference number, including this as well would be a great help.

Visit our website

Go to www.tearfund.nl and click on ‘Contact’ at the bottom of the website or on the top menu under ‘Waarom wij dit doen’. This will take you to a form. You can complete and submit online, specifying in the comment box how and when you would like us to get back to you.