



02. juni 2021

Red Barnets whistleblowerordning

1. Indledning

Red Barnet ønsker at opretholde en høj standard i vores arbejde - både det, der foregår i Danmark og det, der foregår ude i verden. Derfor har Red Barnet oprettet en whistleblowerordning, som medarbejdere, frivillige, samarbejdspartnere og andre, der deltager i eller bidrager til Red Barnets aktiviteter, kan anvende i relation til alvorlige forhold vedrørende Red Barnet.

Whistleblowerordningerne i Red Barnet har til formål

- At øge ansattes mulighed for at ytre sig om kritisable forhold i organisationen uden at frygte for negative ansættelsesretlige konsekvenser.
- At beskytte ansatte, som indgiver oplysninger til whistleblowerordningen.
- At opdage fejl og forsømmelser og derved højne niveauet i organisationens aktiviteter.
- At sikre grundlag for, at Red Barnets værdier, Code of Conduct og andre grundlæggende politikker efterleves af alle der er involveret i Red Barnets aktiviteter.

Omdrejningspunktet i Red Barnet er kerneværdierne, herunder "ansvarlighed" og "samarbejde", der bl.a. handler om, at fejl og utilfredsstillende forhold i organisationen håndteres via daglig kommunikation, dialog og åbenhed baseret på gensidig tillid og respekt. Whistleblowerordningen skal således ses som et supplement hertil, men udfordringer i organisationen bør i udgangspunktet søges løst ved henvendelse til f.eks. nærmeste leder eller tillidsrepræsentanten.

Red Barnets whistleblowerordning læner sig op ad Save the Children International's Whistleblowing policy og Procedures, der gælder for alle medlemsorganisationer under Save the Children, også Red Barnet.

2. Hvem kan indgive oplysninger til whistleblowerordningerne?

Whistleblowerordningen kan anvendes af borgere, medarbejdere, frivillige, samarbejdspartnere og andre der deltager i eller bidrager til Red Barnets aktiviteter.

3. Hvilke oplysninger er omfattet af whistleblowerordningen?

Whistleblowerordningen omfatter kun oplysninger om alvorlige forhold, som er af betydning for Red Barnets aktivitetsvaretagelse. Der foretages i hvert enkelt tilfælde en konkret vurdering af, om der er tale om sådanne alvorlige forhold. Det vil dog i almindelighed omfatte oplysninger om:

- Strafbare forhold, misbrug af økonomiske midler, tyveri, svig, underslæb, bedrageri, bestikkelse mv.
- Grove eller gentagne overtrædelser af væsentlige interne retningslinjer, f.eks. om tjenesterejser, gaver og regnskabsaflæggelse



mv.

- Kritisable forhold, der strider mod Red Barnets politikker, etiske regelsæt (Code of Conduct) og øvrige retningslinjer
- Strafbare forhold eller uforsvarlige forhold hos samarbejdspartnere eller andre, som Red Barnet samarbejder med.
- Bevidst vildledning af borgere, donorer og samarbejdspartnere.

Der forudsættes viden om eller en begrundet mistanke om, at der er begået sådanne alvorlige forhold, når indberetningen finder sted.

Det betyder, at whistleblowerordningen i udgangspunktet ikke omfatter oplysninger om øvrige forhold som bl.a.:

- Overtrædelser af mindre væsentlige interne retningslinjer om f.eks. brug af kontorartikler mv.
- Mobning, chikane, krænkende adfærd eller andre personalerelaterede konflikter på arbejdspladsen.
- Bekymringer i forhold til mistrivsel hos børn, der deltager i Red Barnets aktiviteter og projekter.

Oplysninger om forhold, som beskrevet ovenfor, skal i udgangspunktet håndteres via almindelige kommunikationsveje, f.eks. til nærmeste leder eller tillidsrepræsentant, men whistleblowerordningen kan anvendes, hvis det vurderes som mest hensigtsmæssigt, f.eks. hvis den normale kommunikationsvej ikke er mulig.

For så vidt angår bekymringer i forhold til mistrivsel hos børn, skal der rettes henvendelse til Underretningsteamet i Red Barnet. Red Barnets Underretningsteam er således omdrejningspunkt for al rapportering om mistanker om børns mistrivsel og sikrer en børnefaglig vurdering. Hvis Underretningsteamets behandling af en henvendelse også involverer mistænkelige forhold eller kritik af medarbejdere eller frivillige i Red Barnet, har Underretningsteamet en pligt til at videregive disse oplysninger til Red Barnets Chef for HR.

4. Hvordan behandles indberetninger?

Ved modtagelse af en indberetning gennem whistleblowerordningen foretages en visitation. Hvis der er grundlag for en realitetsbehandling af indberetningen, iværksættes en nærmere undersøgelse af forholdet under inddragelse af oplysninger internt i Red Barnet. I relevant omfang inddrages oplysninger fra eksterne samarbejdspartnere mv.

Hvis en indberetning vedrører Generalsekretæren eller en afdelingsleder i Red Barnet, vil Forretningsudvalget i Hovedbestyrelsen blive underrettet og inddraget i behandlingen af indberetningen.

Hvis undersøgelsen viser kritisable forhold, er der forskellige reaktionsmuligheder:

- Hvis der er tale om overtrædelse af straffelovningen, vil det blive anmeldt til politiet.
- Vedrører sagen alvorlige fejl og forsømmelser eller alvorlige overtrædelse af Red Barnets politikker, etiske regelsæt (Code of Conduct) og øvrige retningslinjer begået af en ansat i Red Barnet, kan det medføre negative ansættelsesretlige reaktioner, f.eks. lønnedgang, advarsel eller afskedigelse.



- Vedrører sagen alvorlige fejl og forsømmelser eller alvorlige overtrædelser af Red Barnets politikker, etiske regelsæt (Code of Conduct) og øvrige retningslinjer begået af en frivillig i Red Barnet, kan det medføre, at den pågældende ikke længere kan have tilknytning til Red Barnets aktiviteter.
- Vedrører sagen alvorlige fejl eller forsømmelser begået af en samarbejdspartner, kan det medføre kontraktretslige konsekvenser for samarbejdspartneren, f.eks. kontraktophævelse.

5. Hvordan indgives oplysninger til whistleblowerordningen?

Oplysninger skal indgives via whistleblowerportalen på Red Barnets hjemmeside.

Det er via whistleblowerportalen muligt at indgive indberetning anonymt, ligesom det efterfølgende er muligt at kommunikere anonymt med Red Barnet, således at organisationen kan stille supplerende spørgsmål til anmelderen uden at kende vedkommende identitet. På denne måde kan det bl.a. sikres, at sagen oplyses på tilstrækkelig vis, før der træffes afgørelse.

Undersøgelser på baggrund af anonyme henvendelser kan imidlertid give anledning til vanskeligheder i praksis, ligesom Red Barnet er tilbageholdende overfor at benytte anonyme oplysninger som led i en indgribende afgørelse, f.eks. over for en af organisationens ansatte. Det kan indebære, at en indberetning om ulovligheder mv. i Red Barnet må afsluttes, uden det er muligt at komme til bunds i den. Derfor opfordrer Red Barnet til, at oplysninger ikke indgives anonymt.

Hvis en indberetning indgives via Whistleblowerordningen uden anonymitet, vil der i Red Barnets interne behandling blive sikret anonymitet i videst muligt omfang, dog med respekt for persondatalovgivningens regler.

6. Hvilke rettigheder har personer, der indgiver oplysninger til whistleblowerordningen (whistleblowere)?

Personer, der indgiver oplysninger via whistleblowerordningen, vil som udgangspunkt blive orienteret om sagens evt. udfald. Orienteringen vil dog ikke indeholde oplysninger om eventuelle ansættelsesretlige konsekvenser.

Der kan efter gældende regler evt. være adgang til at få indsigt i navnet på den person, der har indgivet oplysningerne, hvis indberetningen ikke er indgivet anonymt. F.eks. kan de personer, som oplysningerne drejer sig om, have ret til at vide, hvem der har indgivet oplysningerne. I Red Barnets behandling af sagen sikres fortrolighed omkring den person, der har indgivet indberetningen – uanset om indberetningen er indgivet anonymt eller ej.

Beskyttelse mod repressalier og lignende

Personer, der indgiver indberetning via whistleblowerordningen, er beskyttet mod negative konsekvenser forbundet med en indberetning. Det sikres ved, at enhver efterfølgende kan informere Red Barnet via whistleblowerordningen.



Hvis der via whistleblowerordningen indberettes oplysninger om, at en ansat har oplevet negative konsekvenser efter at have indgivet en indberetning i god tro, skal Chef for HR drøfte sagen med den øverste ledelse (SMT), og orientere Forretningsudvalget.

Den særlige procedure har til formål at øge beskyttelsen af de ansatte, som vælger at lægge navn til en indberetning.

7. Hvilke rettigheder har de personer, oplysningerne handler om?

De personer, som oplysningerne omhandler, vil i udgangspunktet blive underrettet, hvis der indgives indberetning om dem. Den omhandlede person vil således modtage underretning, når sagen henlægges, hvis den er åbenbart grundløs, ligesom den omhandlede person vil blive orienteret, hvis sagen realitetsbehandles. Tidspunktet herfor vil afhænge af sagens karakter, herunder efterforskningsmæssige hensyn.

Den omhandlede person har i den forbindelse ret til at anmode om berigtigelse, sletning eller begrænsning af oplysninger.

Der må ikke bevidst indgives urigtige eller vildledende oplysninger gennem whistleblowerordningerne. Oplysninger, der er indgivet i ond tro, kan medføre en politianmeldelse, ligesom det kan få negative ansættelsesretlige reaktioner eller medføre kontraktretlige konsekvenser for den person, der har indgivet oplysningen.

I tilfælde af, at oplysningerne ikke er korrekte, eller hvis indberetningen er åbenbart grundløs, slettes oplysningerne straks. Hvis der på baggrund af de indsamlede oplysninger gennemføres en ansættelsesretlig sanktion over for den ansatte, eller der i øvrigt foreligger grunde til, at det er sagligt og nødvendigt fortsat at opbevare oplysninger om den ansatte, vil oplysningerne blive opbevaret i den pågældendes personalemappe.



June 2, 2021

Save the Children Denmark's Whistle-blower Scheme

1. Introduction

Save the Children, Denmark (Red Barnet) wants to maintain the high standard of our work – both in Denmark and the rest of the world. Therefore, Red Barnet has created a Whistle-blower Scheme, which employees, volunteers, business partners and others who participate in or contribute to the Red Barnet's activities can use in relation to matters of concern affecting Red Barnet.

The purpose of Red Barnet's Whistle-blower Scheme is to

- Increase employees' ability to express criticism within the organization without fear of negative consequences to their employment.
- Protect employees who submit information to the Whistle-blower Scheme.
- Detect maladministration and thereby raise the level of the organization's activities.
- Ensure that everyone involved in Red Barnet's activities comply with Red Barnet's values, the Code of Conduct and other basic policies.

The focal point of Red Barnet is its core values, including "responsibility" and "cooperation", which, among other things, means that errors and unsatisfactory conditions within the organization are handled through daily communication, dialogue and openness, based on mutual trust and respect. The Whistle-blower Scheme is regarded as a supplement to this, as challenges within the organization should initially be resolved by contacting, e.g. the immediate manager or union representative.

Red Barnet's Whistle-blower Scheme is based on Red Barnet International's Whistleblowing policy and Procedures that apply to all member organizations within Red Barnet, including "Red Barnet".

2. Who can submit information via the Whistle-blower Scheme?

The Whistle-blower Scheme can be used by citizens, employees, volunteers, business partners and others who participate in or contribute to Red Barnet's activities.

3. What information is covered by the Whistle-blower Scheme?

The Whistle-blower Scheme only applies to the information on serious issues that are of importance to Red Barnet's performance of activities. In each case, a concrete assessment is made of whether such serious issues are involved. However, it will generally apply to information on:

- Criminal offences, misuse of financial resources, theft, deceit, embezzlement, fraud, bribery, etc.
- Serious or repeated violations of essential internal guidelines, e.g. on official trips, gifts, and financial reporting.
- Questionable matters that conflict with Red Barnet's policies, Code of



- Conduct and other guidelines
- Criminal offences by or irresponsible conditions at partners or others with whom Red Barnet cooperates.
- Deliberate misleading of citizens, donors and business partner.

It is presumed that knowledge or reasonable suspicion of such serious issues exist at the time of the reporting.

This means that, in principle, the Whistle-blower Scheme does not include information on other matters such as:

- Violations of less important internal guidelines on, for example, use of office supplies, etc.
- Bullying, harassment, abusive behavior or other staff-related conflicts in the workplace.
- Concerns about lack of well-being among children participating in Red Barnet's activities and projects.

Information on conditions, as described above, must initially be handled via normal ways of communication, e.g. reports to the immediate manager or union representative. However, the Whistle-blower Scheme can be used if this is considered the most appropriate; for instance, if the normal ways of communication are not available.

As far as cases about lack of well-being among children go, the Notification Team within Red Barnet must be notified. Red Barnet's Notification Team is thus the focal point of all reporting related to suspicions of children's lack of well-being and will ensure an assessment of the child's well-being. If the Notification Team's handling of an inquiry also includes suspicious matters or criticism of employees or volunteers of Red Barnet, the Notification Team is required to disclose this information to Red Barnet's HR manager.

4. How are reports processed?

Upon receipt of a report through the Whistle-blower Scheme, a review is performed. If the report is deemed admissible, a closer examination of the situation is initiated, which includes internal information from Red Barnet. Where relevant, information from external partners and others is included.

If a report concerns the Secretary-General or a department manager of Red Barnet, the Executive Committee of the Executive Board will be notified and involved in the processing of the report.

If the investigation reveals questionable matters, there are various ways to address these:

- If the matter concerns a violation of the criminal code, this will be reported to the police.
- If the matter concerns serious errors, maladministration or serious violation of Red Barnet's policies, Code of Conduct and other guidelines by an employee of the Red Barnet, this may have a negative impact on the employment of the employee, for example, wage reduction, warning or dismissal.
- If the matter concerns serious maladministration or serious violations of Red Barnet's policies, Code of Conduct and other guidelines by a volunteer of Red Barnet, the consequence may be that the person concerned can no longer be



associated with Red Barnet's activities.

- If the matter concerns serious errors or omissions by a business partner, this may result in contractual consequences for the partner, e.g., termination of the contract.

5. How to submit information to the Whistle-blower Scheme?

The information must be submitted via the Whistle-blower Portal on Red Barnet's website.

Reports can be submitted anonymously via the Whistle-blower Portal, and it is subsequently possible to communicate anonymously with Red Barnet, so that the organization, for instance, can ask the notifying party additional questions without learning their identity. This ensures, among other things, that the case is adequately elucidated before a decision is made.

Investigations that are based on anonymous reports can, however, give rise to difficulties in practice, just as Red Barnet is reluctant to use information provided anonymously as part of an intrusive decision, for instance, that affects one of the organization's employees. This means that a report on illegal activities, etc. within Red Barnet must be closed without it being possible to get to the bottom of the issue. Therefore, Red Barnet calls for information not to be submitted anonymously.

If a report is submitted via the Whistle-blower Scheme without anonymity, Red Barnet's internal processing will, however, ensure anonymity to the greatest extent possible, respecting the rules on personal data.

6. What rights do people who submit information to the Whistle-blower Scheme (whistle-blowers) have?

People who submit information via the Whistle-blower Scheme will, as a rule, be notified of the outcome of the case. However, this will not include information on any employment-related consequences.

According to the current legislation, it may be possible to obtain access to the name of the person who submitted the information if the information was not submitted anonymously. The person to whom the information relates may, for instance, have the right to know who submitted the information. When Red Barnet processes the case, confidentiality is ensured about the person who has submitted the report – regardless of whether the report has been submitted anonymously or not.

7. Protection against retaliation and the like

Individuals who submit reports via the Whistle-blower Scheme are protected against negative consequences associated with the reporting. This is ensured by the fact that anyone can subsequently notify Red Barnet via the Whistle-blower Scheme.

If it is reported via the Whistle-blower Scheme that an employee has experienced negative consequences after submitting a report in good faith, the HR manager shall discuss the matter with the senior management (SMT) and notify the Executive Committee.



The special procedure aims to increase the protection of employees who choose to disclose their names when reporting.

8. What are the rights of the persons the information is about?

The persons to whom the information relates will initially be notified of the report. The person concerned will thus be notified when the case is closed if it is manifestly unfounded, and the person concerned will be informed if the case is deemed admissible. The timing will depend on the nature of the matter, including investigative considerations.

In that context, the person concerned has the right to request rectification, deletion or limitation of information.

The Whistle-blower Scheme may not be used to submit incorrect or misleading information deliberately. The submission of information in bad faith may be reported to the police and may have negative consequences for the employment or result in contractual consequences for the person submitting the information.

In the event that the information is incorrect or if the report is manifestly unfounded, the information will be deleted immediately. If, on the basis of the information gathered, an employment-related sanction is imposed on the employee or, moreover, there are reasons why it is objectively necessary to continue to store information about the employee, the information will be stored on the employee's personnel file.



11. april 2019

Red Barnets retningslinjer for håndtering af indberetninger via whistleblower-ordningen

Whistleblowerordningen

Whistleblowerordningen er forankret hos Chef for Organisation i Red Barnet, som sammen med mindst én whistleblowerrådgiver visiterer indkomne indberetninger.

Indberetninger til Red Barnets whistleblowerordning foretages via whistleblowerportalen på Red Barnets hjemmeside. Anmelderen modtager umiddelbart herefter en mail med bekræftelse på, at indberetningen er modtaget.

Det er via whistleblowerportalen muligt at indgive anmeldelser anonymt, ligesom det efterfølgende er muligt at kommunikere anonymt med Red Barnet, således at organisationen bl.a. kan stille supplerende spørgsmål til anmelderen uden at kende vedkommende identitet. På denne måde kan det bl.a. sikres, at sagen oplyses tilstrækkeligt til, at den kan behandles.

Behandlingen af indberetninger

Alle indkomne indberetninger – også dem, der indberettes via leder eller tillidsrepræsentant – registreres og opsummeres i en database på Sharepoint, hvor kun få medarbejdere har adgang til. Chef for Organisation i Red Barnet rapporterer én gang årligt til Red Barnets Hovedbestyrelse om antallet af indkomne indberetninger, karakteren heraf og statistisk om behandlingen og udfaldet af indberetningerne.

Chef for Organisation eller whistleblowerrådgiveren visiterer indberetninger fra Whistleblowerordningen og vurderer indberetningens karakter i forhold til, hvorvidt den skal slutes som grundløs, i hvilket omfang der skal indhentes yderligere oplysninger, og om indberetningen skal klassificeres som operationel eller sensitiv:

- **Operationelle indberetninger** relaterer sig til operationelle emner vedrørende driftsaktiviteter, regnskab mv. og vil ofte være oplysninger vedrørende kvaliteten i arbejdet og håndtering af indsatsen.
- **Sensitive indberetninger** er typisk indberetninger i forhold til alvorlige brug på retningslinjer, korrupsion, seksuel chikane eller diskrimination. Sensitive indberetninger er af mere følsom karakter i forhold til overtrædelse af Red Barnets etiske regelsæt (Code of Conduct) og de til enhver tid gældende politikker og retningslinjer, herunder Red Barnets Børnebeskyttelsespolitik og Politik mod mobning, seksuel chikane og diskrimination.

Efter visitationen sikrer Chef for Organisation eller whistleblowerrådgiveren, at indberetteren bliver orienteret om sagens videre behandling.



Operationelle indberetninger

En indberetning, der klassificeres som operationel, bliver videresendt og behandlet af en relevant leder (sektionsleder eller afdelingschef), f.eks. den leder, der er ansvarlig for aktiviteten/programmet og indsatsen, medmindre sagen vedrører lederen. Lederen afdækker sagen og kan i den forbindelse vælge at inddrage relevante medarbejdere – herunder i andre afdelinger. Lederen indstiller sagen til Chef for Organisation, som træffer afgørelse og eksekvere afgørelsen i samarbejde med den relevante leder.

Registrering og opsummering af indberetningens behandling foretages af Organisation.

Sensitive indberetninger

En indberetning, der klassificeres som sensitiv, bliver af hensyn til fortrolighed behandlet af ganske få personer i organisationen. En sensitiv indberetning behandles i en ad hoc nedsat komité, der består af et stabsmedlem (Chef for Organisation) og en relevant leder. Chef for Organisation sikrer orientering af Red Barnets Formand, Red Barnets Hovedbestyrelse eller Forretningsudvalget.

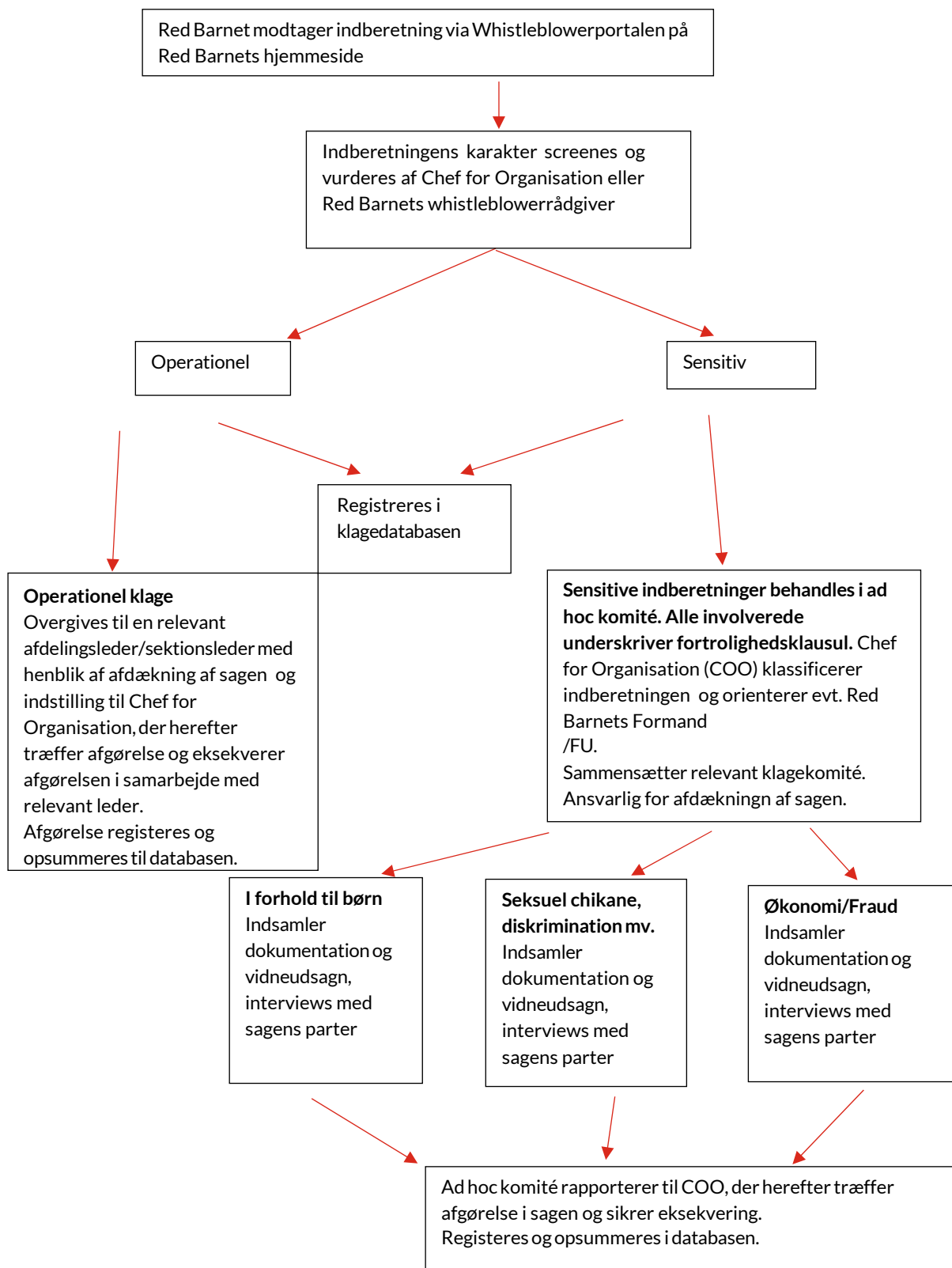
Hvis det drejer sig om en indberetning eller en anmeldelse, der omhandler Chef for Organisation, skal Red Barnets whistleblowerrådgiver sikre, at sagen overgives til Red Barnets Generalsekretær, der herefter orienterer Red Barnets Formand og leder afdækningen af sagen.

Ad hoc komitéen kan vælge at udpege en eller to undersøgere med relevante faglige kvalifikationer. De to undersøgere afdækker indberetningen og rapporterer til komitéen. Chef for Organisation træffer afgørelse i sagen og sikrer eksekvering.

Det er komitéen, der sikrer, at indberetteren og den eventuelle indberettede behandles fair, at behandling foregår i fortrolighed, og at indberetteren ikke efterfølgende udsættes for repressalier eller chikane.

Alle involverede i afdækning af sagen underskriver en fortrolighedserklæring.

Red Barnets whistleblowerordning - intern sagsbehandlingsprocedure



11 April 2019

Save the Children Denmark's guidelines on the processing of reports via the Whistle-blower Scheme

The Whistle-blower Scheme

The responsibility for the Whistle-blower Scheme lies with Save the Children Denmark's (Red Barnet) Director of Organisation, who, together with at least one Whistle-blower Adviser, reviews incoming reports.

Reports to Red Barnet's Whistle-blower Scheme are made via the Whistle-blower Portal on the Red Barnet's website. The notifying party will then immediately receive an email confirming that the report has been received.

Reports can be submitted anonymously via the Whistle-blower Portal, and it is subsequently possible to communicate anonymously with Red Barnet, so that the organisation, for instance, can ask the notifying party additional questions without learning their identity. This ensures, among other things, that the case is adequately elucidated before it is processed.

The processing of reports

All incoming reports - including those reported via a manager or union representative - are recorded and summarised in a Sharepoint database, to which only a few employees have access. Red Barnet's Director of Organisation reports annually to Red Barnet's Executive Board on the number of incoming reports, their nature and statistics on the processing and outcome of the reports.

The Director of Organisation or the Whistle-blower Adviser reviews reports from the Whistle-blower Scheme and assesses the nature of the report as to whether it should be closed as unfounded, to what extent further information must be obtained, and whether the report should be classified as operational or sensitive:

- **Operational reports** concern operational issues regarding operating activities, accounts, etc. and will often be information regarding the quality of the work and the handling of the efforts.
- **Sensitive reports** are typically reports concerning serious breaches of guidelines, corruption, sexual harassment or discrimination. Sensitive reports are of a more sensitive nature pertaining to violations of Red Barnet's Code of Conduct and the policies and guidelines in force at all times, including Red Barnet's Child Protection Policy and Policy against Bullying, Sexual Harassment and Discrimination.

After the review, the Director of Organisation or the Whistle-blower Adviser ensures that the notifying party is informed of the further processing of the case.

Operational reports

A report which has been classified as an operational report is forwarded and processed by a relevant manager (section manager or department manager); for example, the manager responsible for the activity/program and effort, unless the case concerns the said manager. The manager examines the case and may choose to involve relevant employees – including those in other departments. The manager prepares a recommendation regarding the case to the Director of Organisation, who decides and executes the decision in cooperation with the relevant manager.

The Organisation registers and summarises the processing of the report.

Sensitive reports

Due to confidentiality concerns, a report classified as sensitive is processed by very few people within the organisation. A sensitive report is processed by a committee constituted ad hoc consisting of a staff member (Director of Organisation) and a relevant manager. The Director of Organisation notifies Red Barnet's Chairman, Red Barnet's Executive Board or the Executive Committee.

If the notification or report concerns the Director of Organisation, Red Barnet's Whistle-blower Adviser must ensure that the case is handed over to Red Barnet's Secretary General, who then informs Red Barnet's Chairman and is in charge of examining the case.

The ad hoc committee may choose to appoint one or two investigators with relevant professional qualifications. The two investigators examine the report and report to the committee. The Director of Organisation decides on the case and ensures execution of the decision.

The committee shall ensure that the notifying party and any reported person are treated fairly, that processing is performed in confidentiality, and that the notifying party is not subsequently subjected to retaliation or harassment.

All parties involved in the investigation of the case must sign a declaration of confidentiality.

Red Barnet's Whistle-blower Scheme - internal case processing procedure

