



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 sikre, at der kan ske indberetning af alvorlige forhold.
- 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.

Denne politik indeholder en nærmere beskrivelse af whistleblowerordningen. Du kan læse om, hvordan vi behandler dine personoplysninger i forbindelse med whistleblowerordningen i vores Whistleblower Privatlivspolitik.

Hvis du har spørgsmål til denne politik, kan du kontakte Chef for HR på HR@redbarnet.dk.

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 kan ske indberetning i tilfælde, hvor der er tale om faktiske eller potentielle overtrædelser af lovgivningen (herunder EU-lovgivningen) og øvrige alvorlige forhold, herunder forsøg på at skjule sådanne overtrædelser eller alvorlige forhold, eller mistanke herom. Der foretages i hvert enkelt tilfælde en konkret vurdering af, om der er tale om sådanne alvorlige forhold. Det vil dog i almindelighed f.eks. omfatte oplysninger om:



- Strafbare forhold, herunder økonomisk kriminalitet, fx misbrug af økonomiske midler, tyveri, svig, underslæb, bedrageri, bestikkelse, dokumentfalsk mv.
- Grove eller gentagne overtrædelser af væsentlige interne retningslinjer, f.eks. om tjenesterejser, gaver og regnskabsaflægelse 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.
- Overtrædelse af arbejdsmiljøreglerne, herunder alvorlig diskrimination, vold eller chikane.
- Seksuelle overgreb og misbrug. Red Barnet anvender [FN's definition](#) af seksuelle overgreb og misbrug.
- Øvrige alvorlige forhold, herunder fx seksuel chikane og andre former for grov chikane såsom diskrimination f.eks. på grund af race eller politisk eller religiøst tilhørsforhold, eller andre grove, personrelaterede konflikter på arbejdspladsen.
- Uregelmæssigheder på områderne for regnskabsføring, intern regnskabskontrol eller revision.
- Overtrædelse af den finansielle lovgivning, herunder hvidvaskreglerne, bestikkelse eller korruption.

Overtrædelse af databeskyttelsesreglerne, herunder databeskyttelsesforordningen ("GDPR"). Der forudsættes viden om eller en begrundet mistanke om, at der er begået sådanne alvorlige forhold, når indberetningen finder sted.

4. Hvilke oplysninger er ikke omfattet af whistleblowerordningen?

Whistleblowerordningen omfatter i udgangspunktet ikke oplysninger om øvrige forhold som bl.a.:

- Eget ansættelsesforhold, medmindre indberetningen vedrører en alvorlig lovovertrædelse eller et andet alvorligt forhold som angivet i afsnit 3.
- Rent HR-relaterede forhold som f.eks. utilfredshed med løn eller samarbejdsvanskeligheder.
- Overtrædelser af mindre væsentlige interne retningslinjer om f.eks. brug af kontorartikler mv.
- Bekymringer i forhold til mistrivsel hos børn, der deltager i Red Barnets aktiviteter og projekter (se nedenfor).

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.

Der må ikke bevidst indberettes falske anklager mod eller afgives urigtige oplysninger om andre. Falske anklager og urigtige oplysninger kan få erstatningsretlige, strafferetlige og/eller ansættelsesretlige konsekvenser, hvis der foretages en indberetning mod bedre vidende.



5. Hvordan behandles indberetninger?

Indberetninger modtages af Chef for HR samt Chef for Legal & Facility i Red Barnet, som udgør Red Barnets whistleblowerenhed.

Fortrolig behandling

De personer, der er tilknyttet whistleblowerenheden, har tavshedspligt med hensyn til oplysninger, der indgår i indberetningen. Det gælder også andre personer, der får kendskab til oplysningerne.

Oplysninger om whistleblowerens identitet og andre oplysninger, som identiteten direkte eller indirekte kan udledes af, må ikke uden whistleblowerens udtrykkelige samtykke videregives til andre end personer tilknyttede whistleblowerenheden.

Andre oplysninger fra indberetninger må kun videregives til andre end personer tilknyttede whistleblowerenheden når det sker som led i opfølgning på en indberetning eller for at imødegå den eller de indberettede overtrædelser.

Håndtering af indberetninger

Ved modtagelse af en indberetning gennem whistleblowerordningen foretages en visitation. Whistleblower commiteen bestående af Chef for HR og Chef for Legal & Facility visiterer indkomne indberetninger.

Hvis indberetningen ikke er omfattet af ordningen, foretages der ingen yderligere opfølgning, og whistlebloweren oplyses herom. Herefter slettes indberetningen omgående.

Hvis det vurderes, at indberetningen er omfattet af ordningen, iværksættes en nærmere undersøgelse af forholdet under inddragelse af oplysninger internt i Red Barnet. Afhængig af resultatet af undersøgelsen, tages der stilling til, hvilke skridt der skal tages, herunder om der skal indhentes yderligere information (hvis muligt). I relevant omfang inddrages oplysninger fra eksterne samarbejdspartnere mv. Alle involverede i behandlingen af indberetninger, hvad enten intern eller ekstern vil være omfattet af fortrolig behandling.

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 overtrædelser 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.

Hvis der foretages anmeldelse til politi (eller andre relevante myndigheder), slettes oplysningerne som udgangspunkt straks efter afslutning af sagen hos de pågældende myndigheder, jf. dog nedenfor.



Hvis der på baggrund af de indsamlede oplysninger gennemføres en disciplinær sanktion over for den indberettede medarbejder, eller der i øvrigt foreligger grunde til, at det er sagligt og nødvendigt fortsat at opbevare oplysninger om medarbejderen, vil oplysningerne blive opbevaret på den pågældendes personalesag.

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

Du kan læse mere om Red Barnets håndtering af indberetninger nedenfor under "Red Barnets retningslinjer for håndtering af indberetninger via whistleblowerordningen".

6. Hvordan indgives oplysninger til whistleblowerordningen?

Der kan ske indberetning til whistleblowerordningen på følgende måder:

Indberetning via whistleblowerportalen på Red Barnets hjemmeside

Oplysninger kan indgives via whistleblowerportalen på Red Barnets hjemmeside. Direkte link til whistleblowerportalen er <https://redbarnet.whistleblownetwork.net/>.

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 vedkommendes 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. Se mere herom i vores Whistleblower Privatlivspolitik.

Indberetning til Datatilsynet eller andre eksterne whistleblowerordninger

Indberetninger kan – foruden Red Barnets whistleblowerordning – også ske til Datatilsynets eksterne whistleblowerordning via www.whistleblower.dk. På www.whistleblower.dk findes også yderligere information om øvrige eksterne whistleblowerordninger, som er etableret af andre myndigheder.

Vi opfordrer dog til, at Red Barnets whistleblowerordning benyttes, hvor indberetningen kan imødegås internt, og hvor whistlebloweren vurderer, at der ikke er risiko for repressalier. Uanset dette kan whistlebloweren altid frit vælge, om den vælger at foretage en indberetning internt eller eksternt.

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

Personer, der indgiver oplysninger via whistleblowerordningen, vil som i videst muligt omfang blive orienteret om sagens evt. udfald. Det bemærkes i den forbindelse, at der i mange tilfælde dog ikke vil kunne ske en tilbagemelding til whistlebloweren om indberetningens konsekvenser



mv., idet indberetningen ofte vil føre til en behandling af fortrolige oplysninger eller personoplysninger om indberettede eller andre, som ikke kan deles med whistlebloweren. En evt. orientering vil f.eks. ikke indeholde oplysninger om eventuelle ansættelsesretlige konsekvenser.

8. Beskyttelse mod repressalier og lignende

Personer, der indgiver indberetning via whistleblowerordningen, er beskyttet mod repressalier. Repressalier er enhver direkte eller indirekte handling eller undladelse i arbejdsretlig sammenhæng, som forårsager eller kan forårsage whistlebloweren uberettiget skade, og er en følge af intern eller ekstern indberetning eller offentliggørelse. Det kan f.eks. være negative ansættelsesretlige konsekvenser. Beskyttelsen mod repressalier omfatter også personer, som også kunne lide ansættelsesretlige skader (f.eks. kollegaer), og som bistår whistlebloweren med at foretage en indberetning.

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.

En whistleblower kan heller ikke ifalde ansvar for at afsløre fortrolige oplysninger nævnt i forbindelse med en indberetning under denne whistleblowerordning, hvis whistlebloweren har rimelig grund til at antage (dvs. er i god tro om), at oplysningerne i en indberetning eller en offentliggørelse er nødvendige for at afsløre en overtrædelse.

Derudover må en whistleblower ikke hindres eller forsøges hindret i at foretage indberetninger.

Oplysninger givet i ond tro

Beskyttelsen gælder kun, hvis whistlebloweren har rimelig grund til at antage, at de indberettede oplysninger var korrekte på tidspunktet for indberetningen, og at oplysningerne er inden for anvendelsesområdet af denne whistleblowerordning.

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.

9. 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. Se nærmere herom i vores Whistleblower Privatlivspolitik.



Vi sikrer, at den omhandlede persons identitet beskyttes i forbindelse med sagsbehandlingen, og at den omhandlede person har adgang til et effektivt forsvar, herunder bl.a. ved at registrere indberetninger.

10. Tilsidesættelse af denne politik

Manglende overholdelse af retningslinjerne angivet i denne politik kan medføre ansættelsesretlige konsekvenser, herunder advarsel, opsigelse og i yderste fald bortvisning.



Red Barnets retningslinjer for håndtering af indberetninger via whistleblowerordningen

Whistleblowerordningen

Whistleblowerordningen er overordnet forankret hos Red Barnets COO og et Whistleblower udvalg bestående af Chef for HR og Chef for Legal & Facility i Red Barnet.

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 et kvartalsvis rapporteringsark på Sharepoint, som kun få har adgang til. Chef for HR i Red Barnet rapporterer én gang årligt til Red Barnets Hovedbestyrelse om antallet af indkomne indberetninger, karakteren heraf og statistik om behandlingen og udfaldet af indberetningerne.

Whistleblower udvalget eller/og COO 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, krænkelser, 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 Whistleblowerudvalget, 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 Whistleblowerudvalget, som træffer afgørelse og



eksekverer 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/to medlemmer af Whistleblowerudvalget (Chef for HR/Chef for Legal & Facility) og en relevant direktør. COO (Afdelingschef for Organisation) sikrer orientering af Red Barnets Formand, Red Barnets Hovedbestyrelse eller Forretningsudvalget.

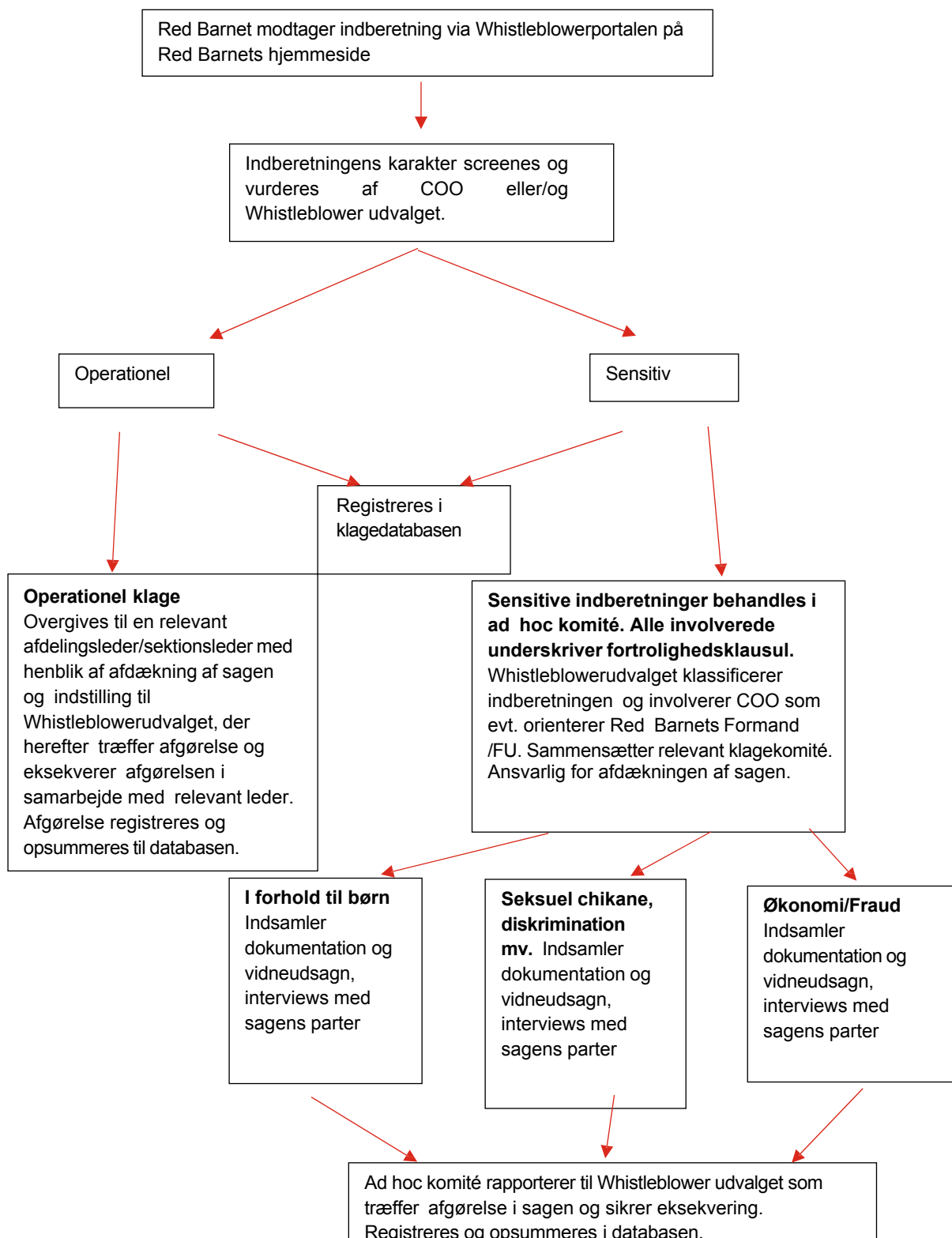
Hvis det drejer sig om en indberetning eller en anmeldelse, der omhandler Chef for HR/Chef for Legal & Facility, skal modsatte part sikre, at sagen overgives til Red Barnets Generalsekretær, der herefter orienterer Red Barnets Formand og leder afdækningen af sagen.

Ad hoc komitéen kan vælge at udpege en eller to undersøgere med relevante faglige kvalifikationer. Her kan også gøres brug af ekstern rådgivning såsom Red Barnets psykolog rådgivning eller eksterne advokater. De to undersøgere afdækker indberetningen og rapporterer til komitéen. Chef for HR/Chef for Legal 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





Save the Children Denmark's Whistleblower 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 Whistleblower 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 Whistleblower Scheme is to

- Securing a channel for reporting serious concerns.
- Increase employees' ability to express criticism within the organization without fear of negative consequences to their employment.
- Protect employees who submit information to the Whistleblower 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 Whistleblower 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 Whistleblower Scheme is based on Save the Children International's Whistleblowing policy and Procedures that apply to all member organizations within Red Barnet, including "Red Barnet".

This policy provides a detailed description of the Whistleblower Scheme. You can read more on how we process your personal data in connection with the Whistleblower Scheme in our Whistleblower Privacy Policy.

If you have any questions, please contact Head of HR at HR@redbarnet.dk.

2. Who can submit information via the Whistleblower Scheme?

The Whistleblower 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 Whistleblower Scheme?

The Whistleblower Scheme only applies to the information on serious issues that are of importance to Red Barnet's performance of activities. Concerns may be reported if they relate to actual or potential breaches of legislation (including EU legislation) and other serious offences, including attempts to cover up such breaches and serious offences, or suspicion hereof. In each case, a concrete assessment is made of whether such serious issues are involved. However, it will generally e.g. apply to information on:

- Criminal offences, including white-collar crime, e.g. misuse of financial resources, theft,



deceit, embezzlement, fraud, bribery, forgery 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.
- Breach of the rules governing health and safety at work, including serious discrimination, violence or harassment.
- Sexual abuse and assault. Red Barnet uses the [UN definition](#) of sexual exploitation and abuse.
- Serious offences such as sexual harassment and other types of serious harassment such as discrimination i.e. due to race, religious beliefs or political opinions, or other serious personal conflicts at the workplace.
- Irregularities in bookkeeping and internal auditing.
- Breach of financial legislation, including the anti-money laundering regulation, bribery or corruption.

Breach of the data protection rules, including the General Data Protection Regulation ("GDPR"). It is presumed that knowledge or reasonable suspicion of such serious issues exist at the time of the reporting.

4. What information is not covered by the Whistleblower Scheme?

In principle, the Whistleblower Scheme does not include information on other matters such as:

- Your own employment, unless the report involves a serious breach of legislation or another serious offence as outlined in section 3.
- Entirely HR-related concerns, such as dissatisfaction with salary or cooperation issues.
- Violations of less important internal guidelines on, for example, use of office supplies, etc.
- Concerns about lack of well-being among children participating in Red Barnet's activities and projects (see below).

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 Whistleblower 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 (Børnefaglig rådgivning) 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 wellbeing. 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 Head of HR.

You must not knowingly make false accusations against others or misrepresent facts about others. If reported against your better judgment, false accusations and misrepresentation may lead to liability and damages, consequences for your employment, and/or criminal penalties.

5. How are reports processed?

Reports are received by Director of Organisation at Red Barnet, which makes up Red Barnet's whistleblower unit.



Confidential processing

The persons appointed to the whistleblower unit are subject to duty of confidentiality with respect to the information included in the report. As are other persons who gain knowledge of the report and information.

Without the whistleblower's express consent, information about the whistleblower's identity or any other information from which the identity may directly or indirectly be derived, may not be disclosed to anyone other than persons appointed to the whistleblower unit.

Other information from reports may only be disclosed to anyone other than the whistleblower unit if the disclosure is made as part of a follow-up to a report or to address the reported violations.

Processing of reports

Upon receipt of a report through the Whistleblower Scheme, a review is performed. The Whistleblower committee consisting of Head of HR and Head of Legal & Facility reviews incoming reports.

If the report is not covered by the Whistleblower Scheme, no further follow-up is carried out and the whistleblower is informed of this. The report is then deleted immediately.

If the reported concern is assessed to be covered by the scheme, a closer examination of the situation is initiated, which includes internal information from Red Barnet. Depending on the findings of the investigation, it will be considered which steps to take, including whether further information should be obtained (if possible). Where relevant, information from external partners and others is included.

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.

If a police report is filed (or other relevant authorities are involved), the information will generally be deleted as soon as the relevant authorities have closed the case, with the exception mentioned just below.

If the information obtained leads to a disciplinary sanction of the employee reported or if other factors make it fair and necessary to continue storing the data about the employee, the data will be stored in the employee's employee file.

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.



You can read more on Red Barnet's processing of reports below under "Save the Children Denmark's guidelines on the processing of reports via the Whistleblower Scheme".

6. How to submit information to the Whistleblower Scheme?

The whistleblower may report their concern under the Whistleblower Scheme through the following channels:

Reporting via the Whistleblower Portal on Red Barnet's website

The information may be submitted via the Whistleblower Portal on Red Barnet's website. A direct link to the Whistleblower Portal is <https://redbarnet.whistleblownetwork.net/>.

Reports can be submitted **anonymously** via the Whistleblower 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 Whistleblower Scheme without anonymity, Red Barnet's internal processing will, however, ensure anonymity to the greatest extent possible, respecting the rules on personal data. For further information, please refer to the Whistleblower Privacy Policy.

Reporting to the Danish Data Protection Agency or other external whistleblower schemes

In addition to Red Barnet's Whistleblower Scheme, the whistleblower may report their concern to the Danish Data Protection Agency's external whistleblower scheme via www.whistleblower.dk. Further information on whistleblower schemes established by other public authorities can be found on www.whistleblower.dk.

However, we suggest that the whistleblower uses Red Barnet's Whistleblower Scheme if Red Barnet is able to address the concern internally and if the whistleblower does not fear reprisals. The whistleblower is free to choose between making a report internally or externally.

7. What rights do people who submit information to the Whistleblower Scheme (whistleblowers) have?

People who submit information via the Whistleblower Scheme will as far as possible be notified of the outcome of the case. Please note however, that in many cases, it will not be possible to give feedback to the whistleblower about the consequences of the report, etc., as the report often will lead to the processing of confidential information or personal data about the reported persons or others, which cannot be shared with the whistleblower. The feedback will e.g. not include information on any employment-related consequences.

8. Protection against retaliation and the like

Individuals who submit reports via the Whistleblower Scheme are protected against retaliation. Retaliation means any direct or indirect act or omission occurring in a work-related context, which may cause unjustified detriment to the whistleblower, and which is prompted by internal or external reporting or public disclosure. Such retaliation can e.g. be negative consequences for



the whistleblower's employment. The protection against retaliation also extends to any persons who also could suffer retaliation in a work-related context (e.g. colleagues), who assist the whistleblower making the report,

If it is reported via the Whistleblower Scheme that an employee has experienced negative consequences after submitting a report in good faith, the Head of HR shall discuss the matter with the senior management team (SMT) and notify the Executive Committee. The special procedure aims to increase the protection of employees who choose to disclose their names when reporting.

Further, the whistleblower cannot be held responsible for revealing confidential information if such information is mentioned in a report filed under the Whistleblower Scheme, if the whistleblower has reasonable grounds to believe that the confidential information is necessary to uncover a concern.

Additionally, no actions may be taken to prevent or attempt to prevent a whistleblower from filing a report.

Submission of information in bad faith

The abovementioned protection only applies if the whistleblower has reasonable grounds to believe that the reported concern was correct at the time of the report and that the information falls within the scope of the Whistleblower Scheme.

The Whistleblower 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.

9. 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. See further in our Whistleblower Privacy Policy.

We ensure that the identity of the person affected or mentioned in a report is protected in relation to the processing of the report. We also ensure that the person has access to effective defence, e.g. by ensuring that reports are documented.

10. Non-compliance with this policy

Non-compliance with the guidelines of this policy may have employment law consequences, including a warning, notice of termination or, at worst, summary dismissal.

Save the Children Denmark's guidelines on the processing of reports via the Whistleblower Scheme

The Whistleblower Scheme

The overall responsibility for the Whistleblower Scheme lies with Save the Children Denmark's (Red Barnet) Director of Organisation, and the Whistleblower committee consisting of Head of HR and Head of Legal & Facility.

Reports to Red Barnet's Whistleblower Scheme are made via the Whistleblower 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 Whistleblower 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 quarterly report at Sharepoint, to which only a few employees have access. Red Barnet's Head of HR 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.

Whistleblower committee or/and COO reviews reports from the Whistleblower 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 Whistleblower committee 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 Whistleblower committee, 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 one to two members of the Whistleblower committee, and a relevant director. COO notifies Red Barnet's Chairman, Red Barnet's Executive Board or the Executive Committee.

If the notification or report concerns members of the Whistleblower committee, Red Barnet's other member of the Whistleblower committee 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. It is possible and likely that external advisors are involved such as Red Barnet's psychologist counselling firm or external lawyers. 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 Whistleblower Scheme - internal case processing procedure

