



ECPAT International

Whistleblowing Function

In this policy 'Whistleblowing' means the reporting by employees and others of suspected misconduct, illegal acts or failure to act within ECPAT International.

The aim of this policy is to encourage employees and others who have serious concerns about any aspect of ECPAT's work to come forward and voice those concerns.

The policy applies to employees, interns, and consultants engaged with ECPAT International, regardless of their working location, hereinafter referred to as "employees".

Employees are often the first to realise that there may be something seriously wrong within the organisation. 'Whistleblowing' is viewed as a positive act that can make a valuable contribution to the organisation's efficiency and long-term success. It is not disloyal to colleagues or the organisation to speak up. ECPAT is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in all of its practices.

This policy aims for an employee to:

- feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- understand the avenues available to raise those concerns and receive feedback on any action taken
- be ensured to receive a response to concerns raised and awareness of how to pursue them if not satisfied
- be aware of full protection from possible reprisals or victimization if any disclosure was made in good faith.

The whistleblowing function is not intended to replace other procedures, such as:

- Grievances procedure (Employee Manual)
- Reporting procedures on harassment (Employee Manual)
- Articles of Association; suspension procedures for Supervisory Board members.

What can be reported:

Any serious concerns about activities or the conduct of staff members or others directly related to the actions, or acting on behalf of the ECPAT International.

These concerns might relate, but is not limited, to:

- Serious mismanagement;
- Breaches of (ethical) codes of conduct;
- The abuse of trust, power or position for improper gain;
- The receiving or offering of bribes;
- Fraud;
- Blackmail;
- Conflict of interest; or

- Nepotism.

Confidentiality

All concerns reported will be treated in confidence and every effort will be made not to reveal the identity of the reporter if that is their wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action without help of the reporter. In case the reporter offers help, advice and support will be provided.

Anonymous Allegations

This policy encourages to only raise allegation with disclosure of the identity of the reporter. If the reporter is unknown, it may be more difficult to protect their position or to give feedback. This policy is not ideally suited to concerns that are raised anonymously.

Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Executive Director. In exercising this discretion, the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

Untrue Allegations

If an allegation is raised in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, the concern will be recognized without further consequences for the reporter. If, however, an allegation is frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken against the reporter.

Raising a concern

A concern should be reported to the Executive Director. In case the allegation concerns an act of the Executive Director, the concern can be reported to the Chair of the Supervisory Board. Concerns can be raised in writing or verbal.

Within ten working days of raising the concern, the officer who received the report will acknowledge the receipt and propose a plan for investigation. The amount of contact with the reporter during the investigation depends on the nature of the matter raised.

The reporter will be assured that the disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, the reporter will be kept informed of the progress and outcome of any investigation.