



Stichting War Child

SPEAK UP! PROCEDURE

Stichting War Child (War Child) believes that

NO CHILD SHOULD BE PART OF WAR. EVER.

And in keeping with this vision, everyone involved in our work should at all times act in accordance with our three Integrity Values:

ACCOUNTABLE, RESPECTFUL, TRANSPARENT.

These Integrity Values also serve to ensure the safety and wellbeing of everyone we work for and with.

Yet you may still hear, witness or experience War Child representatives - or even the organization in general - engage in conduct that falls short of these values.

In that event, we invite you to speak up. Speaking up is an obligation in the mandate that we have to protect children.

There are multiple confidential channels through which you can raise your concern. This helps ensure we can fulfil our commitment and responsibility to protect staff and everyone related to our work.

This Speak Up! Procedure is applicable to anyone who wants to raise a concern about observed or suspected misconduct of War Child representatives or about any failure of the organization in general.



I NEED TO SPEAK UP?

Country Office Child Safeguarding Focal Point, Internal Auditor or Management

or

ASAP within 2 hours



War Child Integrity Online Portal
www.warchildholland.org/speakup
(possible to remain anonymous)

or

ASAP within 24 hours



Global Integrity Advisor
speakup@warchild.nl
+31 6 392 752 91
(possible to remain anonymous)

ASAP within 24 hours



I WANT TO SPEAK TO SOMEONE CONFIDENTIALLY?

You can always consult your HR Contact Person

or

Consult the Integrity Focal Point in your office or the Global Integrity Advisor

or

If you want to consult someone external, reach out to the External Confidential Advisor or use the 'ask a question' tool on the War Child Integrity Portal

WHO CAN SPEAK UP?

Everyone working for or on behalf of War Child is expected to speak up if they hear, witness or experience any incidents of misconduct within the organization. And the ability to speak up is not limited to War Child representatives - it is also available to any party with whom War Child has or has had a working relationship or any other person who wants to raise a concern about any incidents of misconduct or failure observed or experienced within the scope of War Child's work.

TYPE OF CONCERNS

This Speak Up! Procedure applies to any concern regarding:

- ✓ the conduct of an individual working for or on behalf of War Child
- ✓ the performance of the organization in general

This procedure encompasses the following:

- **Child Abuse:**
Child abuse is any act which individuals, institutions or processes do - or fail to do - which directly or indirectly harms children or damages their prospect of a safe and healthy passage into adulthood. There are five key recognised types of abuse: physical, emotional and sexual abuse, as well as neglect and exploitation.
- **Sexual misconduct:**
This encompasses - but is not limited to - sexual assault, sexual harassment, sexual exploitation, sexual abuse, etc.
- **Fraud and Corruption:**
This encompasses - but is not limited to - instances of fraud, theft, bribery, nepotism, money laundering, terrorist financing, shoplifting, conflict(s) of interest, counterfeiting money, cybercrime, extortion or corruption. Fraud and Corruption also encompasses misappropriation of assets, misstatements and other irregularities in company records, including the intentional misstatement of the results of operations, financial wrongdoing, forgery or other alteration of documents, aid diversion and any other similar acts.
- **Other unwanted behaviour:**
This encompasses - but is not limited to - acts of bullying, harassment, discrimination and other breaches of War Child's Code of Conduct and related policies and procedures. All other forms of misuse of power that could arise between or result from War Child staff are included within this category.
- **Failure of the organization:**
This is defined as any failure of the organization in general to comply with any of its commitments or global policies and procedures. For example, failure of War Child to comply with its Responsible Fundraising Policy.

THIS PROCEDURE DOES NOT ADDRESS:

Contractual employment grievances or any concerns related to the War Child Performance Management process. Please refer to your HR contact person for support and advice with regard to these particular concerns.

Concerns related to your donation or to fundraisers in the Netherlands. Please refer to the appropriate contact form on our website.

WHO CAN I TURN TO FOR ADVICE?

(FOR WAR CHILD STAFF)

If you have a concern and you are unsure what to do about it or feel you need support - or even just to have your concern heard - there are several options open to you.

If you are a War Child staff member, you have the option to turn to different people for advice:

2. Your HR Contact Person

HR can provide advice and support if you have any concern regarding our codes of conduct. HR will keep anything you discuss confidential if you wish.

2. Your Integrity or Child Safeguarding Focal Point or the Global Integrity Advisor, Global Child Safeguarding Advisor or Internal Auditor

Every country office has at least one Integrity and Child Safeguarding Focal Point. They are both trained on the War Child Integrity Framework and / or / Child Safeguarding. They can provide a completely confidential, listening ear or concrete advice on the available channels to address your concern. They are also trained in psychological first-aid and can refer you to War Child's staff care services if required or desired. You can find the Terms of Reference as well as a list of the War Child Integrity Focal Points on SharePoint: <https://warchild.sharepoint.com/sites/Integrity> or request it from your HR contact person.

You can reach the Global Integrity Advisor, Global Child Safeguarding Advisor or Internal Auditor on the contact channels mentioned in the Speak Up! Flow chart on page 2.

2. External Confidential Advisor

War Child has engaged the services of an External Confidential Advisor who is available if you have a concern about the conduct of an individual or the performance of the organization in general.

This advisor can provide appropriate advice, care and support for staff who have a concern. They can also point you to the available channels to speak up.

The External Confidential Advisor works completely independently of War Child and will never share information you discuss with them nor your name with War Child.

You can find the contact details for the External Confidential Advisor on SharePoint: <https://warchild.sharepoint.com/sites/Integrity>.

SPEAK UP! CHANNELS

War Child offers the following channels below through which you can speak up.

You are encouraged to speak up as soon as you can, do not lose time - even if you might not have all the facts related to your concern. There is no need to further investigate the matter yourself - you are not required to gather evidence to build a case.

Please note that all War Child representatives are obliged to speak up as soon as reasonably possible.

INTERNAL CHANNELS

A. Local War Child contact person (not anonymous)

(for third parties)

You can speak up directly to the Child Safeguarding Focal Point (**CSFP**) in your office, Internal Auditor¹ or your management depending on the type of issue that concerns you. Management could be your own line manager, the manager next in line or a peer of your line manager. You can also speak up directly to your Country Director, Holland Office Management Team member or the Managing Director.

If you are not a staff member of War Child, you can speak up directly to your local War Child contact person. You can also use any of the other channels outlined in this Speak Up! Procedure.

Reports filed via these two channels are not anonymous.

B. Global Integrity Framework team experts (possible to stay anonymous)

By email	speakup@warchild.nl
By phone	+ 31 6 392 752 91
By regular mail	Stichting War Child Attn. Global Integrity Helmholtzstraat 61-G 1098 LE Amsterdam The Netherlands

Any concern shared through this email channel will go directly to the Global Integrity Advisor² who will direct the concern to the respective global advisor expert field depending on the issue you type. The three main issues and experts are:

Global Child Safeguarding Advisor

(for staff members and everyone else)

If you have seen, heard or have suspicions that a child in WCH's programmes is at danger of harm or experiencing harm as a result of a WCH representative's actions and for certain reasons you don't feel comfortable to report it within your office channels, please feel free to report your concern at Global Child Safeguarding Advisor through speakup@warchild.nl. These channels are open to anyone both inside and outside the organisation. If you are a War Child representative, you are obliged to report any relevant concerns within 24 hours in line with the reporting flow chart on page 2 of this Speak Up! Procedure.

Global Integrity Advisor

(for staff members and everyone else)

If you have seen, heard, experienced or doubt of a War Child Representative exercising bullying, harassment, discrimination, sexual assault or abuse, and other breaches of War Child's Code of Conduct you can speak up to the War Child Global Integrity Advisor through speakup@warchild.nl. The Global Integrity Advisor's main task is not merely to receive your concern but also to find the most suitable path to an effective response. War Child's Global Integrity Advisor can protect your identity if you wish.

¹ Please note that we do not have human resources in every country office for an internal auditor. As such each War Child employee worldwide is invited to report directly to the Internal Auditor.

² The line manager of the Global Integrity Advisor (Manager Governance & Organisational Development) will be the back-up for this email address and will also have access to this email address.

Internal Auditor

(for staff members and everyone else)

If you have seen, heard, experienced or doubt that a War Child representative may be implied in fraud, corruption, theft, bribery, nepotism, money laundering, terrorist financing etc, please report your concern to speakup@warchild.nl. The Internal Auditor will deal with the case and protect your identity if you wish.

EXTERNAL CHANNEL

War Child Integrity Portal - Convercent (possible to stay anonymous)

(for staff members and everyone else)

If you rather want to raise your concern through a confidential external channel, you have the option to use War Child's Integrity Portal. This channel allows reports of all the categories mentioned in page 4 to be reported and filed anonymously (if desired). War Child makes use of an independent service provider for this purpose, called Convercent. Reports can be filed in your own language and the service is available 365 days a year.

To go to the War Child Integrity Portal, please click

<http://www.warchildholland.org/speakup>.

If you make an anonymous report, Convercent will not share any identifying information with War Child. If Convercent receives information regarding any allegation of serious misconduct (such as criminal activity), this will be reported to an authorized external or internal global War Child expert recipient typically within one hour.

QUESTIONS AND ANSWERS

I MADE A REPORT - WHAT HAPPENS NEXT?

Reports Regarding the failure of the Organization

If you hand in a report regarding the performance of the organization, the report will be referred to the appropriate Management Team member who will follow up on it.

Reports Regarding the Conduct of a War Child Representative (towards adult and child individuals in our offices or programmes)

We will first and foremost make sure that all individuals involved in the report are safe. If you reported via your line manager, Integrity/CSFP or a country based War Child contact person, your report will be led by them and directed to either the respective Global Advisors as required by the case. They will make a pre-assessment of your report and summon the respective country based complaints committee to take further decisions; if necessary.

If you reported directly to the Global Integrity Advisor, Internal Auditor, or Global Child Safeguarding Advisor through the address speakup@warchild.nl, they will make a pre-assessment of your report and summon the respective complaints committee to take further actions and decisions; if necessary.

If you reported via the Integrity Portal:

- ✓ In anonymous manner, then your report will go to the Convercent external experts to handle the case by liaising with war child experts, yet maintaining the anonymous identity of the reporter.
- ✓ In non-anonymous manner your report will be directed to the respective global Advisor. This person will then make a pre-assessment of your report and summon the respective complaints committee to take further decisions; if necessary.

You will normally receive a written acknowledgement of receipt within three working days and, whenever possible, you will be kept up to date about the progress of your report.

Who is part of the Complaints Committee and what do they do?

War Child knows four complaints committees:

1. Complaints Committee for Code of Conduct cases:

- a. *Chair*: Global Integrity Advisor
- b. Human Resources (advisor, HR manager and/or other HR person as appropriate)
- c. Liaise with (where required): Director Communications and Advocacy, Manager 2PG, Security Officer, Legal Advisor
- d. IPD/Regional Representative/CEO for high risk cases

2. Complaints Committee for Child Safeguarding cases:

- I. Country Level (this will be defined in each country but a minimum of the below functions must be part)
 - a. Chair: Country Office Child Safeguarding Focal Point
 - b. Country Director / Regional/ IPD
 - c. Liaise with (where required): Legal Advisor, 2PG Focal Points, Human Resources, Director Communications and Advocacy, Global Integrity Advisor, Security Officer, PSS Specialist
- II. Global Level
 - a. *Chair*: Global Child Safeguarding Advisor
 - b. Country Office Child Safeguarding Focal Point
 - c. Liaise with (where required): Legal Advisor, 2PG Focal Point, Human Resources, Director Communications and Advocacy, Global Integrity Advisor, Security Officer, PSS Specialist
 - d. IPD/ Regional Director/CEO for high risk cases

3. Complaints Committee for Fraud and Corruption cases:
 - a. *Chair*: Internal Auditor
 - b. Respective Country Director
 - c. Amsterdam Finance Manager
 - d. Liaise with (where required): Global Integrity Advisor; Director Communications and Advocacy, Manager 2PG, Security Officer, Legal Advisor, Human Resources Advisor
 - e. IPD/Regional Representative/CEO for high risk cases
4. Complaints Committee for managing director cases and appeals.
 - a. Two members of the supervisory board.

Should any members of the Complaints Committee be directly or indirectly concerned in any particular case, they will not be part of the Complaints Committee nor perform an investigation.

The complaints committee is tasked to manage each incident reported, assess, draft action plans that might include investigations by internal investigators or third parties, as well as review case reports and execute actions towards war child representatives substantiated cases.

Investigations are in principle carried out by at least two investigators to ensure the highest standards of objectivity. These investigations may therefore include external investigators.

There is a strong emphasis on maintaining confidentiality of all involved (including the person reporting the concern) and we aim for closing a case within 90 days. In exceptional cases, it may take longer than 90 days.

For legal and privacy concerns, or to safeguard the integrity of an ongoing investigation, War Child will not always be able to provide you with the (full) details of the progress of a case or investigation, or a case outcome or actions taken.

CAN MY PRIVACY BE GUARANTEED?

Individuals who report incidents of misconduct entrust us with their observations and experiences. In return we respect their efforts by treating their reports with confidentiality and care, in recognition of the fact that mishandling confidential information can have a serious impact on the safety of affected individuals.

If your concern does not lead to an investigation, your report will only remain known to the individual(s) you reported to and/or the Global Integrity Advisor. The individuals handling your case will have signed a confidentiality agreement and will treat your report with the utmost confidentiality.

If the decision is taken that an investigation will be carried out, your report will be shared with the (external) investigators. Everyone involved will have signed confidentiality agreements and will treat your report with utmost confidentiality. Note that if you filed your report anonymously or express the wish that your identity remains known only to the Global Integrity Advisor or Global Child Safeguarding Advisor, your name will never be shared without your explicit consent.

It should be noted that carrying out investigations of anonymous reports can be difficult.

You must take precautions to ensure confidentiality yourself by maintaining personal discretion, including not discussing the report with colleagues or anyone else.

Please note that in certain cases War Child may be legally obliged to disclose information to law enforcement agencies and / or donors. With regard to reports of child safeguarding concerns, we will in principle inform the guardian(s) and, if a crime is suspected, national authorities, provided this is in the best interests of the child and does not place them at risk of further harm.

Furthermore, War Child is committed to protecting the privacy of everyone involved. Any personal information obtained by War Child and via the War Child Integrity Portal will be dealt with in line with the appropriate privacy laws (including the EU General Data Protection Regulation 2016/679) and will only be used for the purposes defined in this protocol or to comply with the law.

IS IT POSSIBLE TO ANONYMOUSLY MAKE A REPORT?

Yes, you can share your concerns anonymously. Anonymous reports are much more difficult to follow up on and not encouraged, but we will do our best to respond appropriately. However, if resolving an issue, becomes very challenging if you don't reveal your identity, we will reach out to you again for a second possibility to rethink and get your consent considering the greater good.

HOW WILL I BE PROTECTED IF I SPEAK UP?

If you have a genuine concern and a reasonable belief that misconduct has taken place or is happening, even if it is later discovered that you are mistaken, War Child commits to protecting you from losing your job or from suffering any form of retribution as a result. Retaliation against anyone reporting a genuine concern of misconduct through the various 'speak up' channels, or for cooperating with investigations into misconduct, is prohibited and may lead to disciplinary action against the person engaging in the retaliatory acts.

If you believe you are or have been subjected to retaliation as a result of speaking up, you should raise this concern through the reporting channels outlined in this Speak Up! Procedure.

We additionally commit ourselves to protect and support children and adults who have been exposed to harm or abuse as a result of War Child programmes or representatives by referring and/or connecting to specialised support they might need such as psychological, medical or security support.

WHAT IF THIS PROCEDURE IS MISUSED?

Raising concerns must be done in good faith. "Good faith" does not mean that an individual has to be right. However, the suspicion raised must not be of malicious intent - and the reporter must have an honest belief that the information provided is truthful. It is a violation of War Child's Code of Conduct to fabricate false claims and doing so can result in disciplinary measures. When it becomes clear that a report was made maliciously, this can result in disciplinary measures against the person who made the malicious report. However, no disciplinary measures will be taken against staff reporting a genuine concern that later proves to be mistaken or misjudged.

WHAT DO I DO IF I HAVE A CONCERN ABOUT THE FOLLOW-UP ON A REPORT?

If you believe that your concern - or a concern raised against you - has not been handled appropriately, you can hand in an appeal to the Integrity members of the Supervisory Board via email address integrity.supervisoryboard@warchild.nl.

DO WE HAVE ANY OBLIGATION TO REPORT TO THE DONOR FINANCING THAT SPECIFIC RELATED PROGRAMME WHERE MISCONDUCT HAPPENS?

Donors have different regulations and policies when it comes to Integrity, Safeguarding, Fraud and Corruption. War Child agrees to comply to them in the moment of signing the Memorandum of Understanding with the respective donor. As such we do have obligations to report to them based on their regulations and policies. A 2 PG Focal point is all knowledgably aware how to interact with the donors and will be your point of reference for any communication with them.)

CLARIFICATION OF TERMINOLOGY

Allegation: A claim or assertion that an individual has breached War Child's Code of Conduct or related policies and procedures, or committed a crime

Child: A person under the age of 18

Concern: A matter of interest or importance to someone

Conduct: The manner in which a person behaves, particularly in a specific place or situation

Failure: The disregard or omission of expected or required action

Intimidation: To frighten or threaten someone, usually in order to persuade them to do something that you want them to do

Misconduct: Behaviour that is in breach of War Child's Code of Conduct and its related policies and procedures

Report: A formal communication of a concern made to one of the channels outlined in this procedure

Reporter: The person filing a report via any of the Speak Up! channels named above

Retaliation: The action of harming someone because they have harmed oneself; revenge.

Third party: Anyone not a War Child staff member

War Child Staff: Anyone who has an employment, volunteer or internship agreement with War Child

War Child Representative: All employees, interns, volunteers, members of the management team and supervisory board, consultants, service providers, partner organizations and their (staff) members, ambassadors, accompanying family members, as well as anyone representing War Child in any capacity.

Child Safeguarding: Protecting children from harm perpetrated by any I/NGO representative themselves