



Whistleblowing routines

FIAN Norway

FIAN Norway is committed to a culture of compliance, ethical behavior and good corporate governance. This whistleblowing routine is part of this commitment.

In cases of corruption and malpractice

If suspicion of malpractice arises, all staff and elected representatives are expected to disclose this to the appropriate person. Proofs and documentation must not be removed or destroyed.

Malpractice cannot be ignored and must be examined and documented in order to uncover what has happened. Malpractice must have consequences for the employment or position of the person charged, and serious incidences involving the breaking of national law/criminal offenses must always be reported to the police.

FIAN Norway will ensure that all suspicions or disclosed incidences will be followed up and the person responsible will be held accountable. Whistleblowers shall be ensured anonymity and be safeguarded against repercussions.

Procedure of disclosure

The procedure covers the disclosure of all categories of malpractice covered by Norwegian law and includes disclosures relating to malpractice by staff at all levels in the organisation as well as agency workers, consultants, contractors providing services, and placements on vocational and work experience schemes.

The procedure is for the use of all FIAN Norway staff regardless of whether working in FIAN Norway's office or from home including board members, consultants, contractors providing services, agency workers, volunteers and placements on vocational and work experience schemes who make disclosures about things that have happened, are happening or are likely to happen as long as suspicions are raised honestly and in good faith, irrespective of whether the allegation is later confirmed to be true. The procedure is meant to enable and encourage FIAN staff to make disclosures internally.

1. How to make a disclosure

Concerns about malpractice that has happened, is happening or may happen should be raised as early as possible.

Any member of staff who wishes to make a disclosure must raise it in writing with the appropriate person.

All written disclosures must clearly outline the issue and be accompanied by any supporting evidence and relevant dates. Disclosures dealing with fraud and/or money laundering should have documentary evidence and describe the persons involved and the process through which the fraud or money laundering happened.

2. Who to address the disclosure to

Where a member of staff wishes to disclose information relating to illegal practices they may raise the matter with their Line Manager. In FIAN Norway this will be the Executive Director, as all report directly to him or her.

It is anticipated that the majority of disclosures can be raised in this way. However, if for some legitimate reason the staff cannot make the disclosure to the Executive Director, the disclosure should be made to the Chair of FIAN Norway's board. This may for example happen if there is fear that evidence could easily be destroyed.

Where the whistle-blower does not have confidence in the Executive Director or the Chair of the Board the person may choose to make the disclosure him-/herself to the relevant external institutions.

Disclosures about fraud and money laundering should always be copied to the Chair of the board. The person (Executive Director or Chair of the board) to whom the disclosure is reported should always consult the Board member in charge of the finances before making any ruling about how the issue will be dealt with.

In situations where the whistle-blower is convinced that the line manager or the concerned person in the organisation has not made the proper disclosure to the external regulatory or overseeing bodies, he will be protected under this policy if he makes the disclosure himself.

In specific situations disclosures about health and safety are to be made to external authorities as well. Criminal offences and even the planning of those offences should also in all cases be reported to the police.

3. What happens next?

Arrangements will be made to investigate the suspicion thoroughly and fairly, in line with FIAN's and donor's guidelines and requirements. Members of staff and volunteers may be asked to act as witnesses to the investigation.

After investigating all the facts, the investigating officer will inform the staff as to action to be taken.

4. Malicious reports

Any member of staff or volunteer who uses this policy to make intentionally malicious accusations, in order to harm the reputation or position of another will not be protected by this policy and may be subject to disciplinary action.

Any member of staff who discusses their suspicions with colleagues other than the person to whom they have made or should make the disclosure will not be protected by this policy and may be subject to disciplinary action.

5. Review of the process

In order to ensure continuous learning and improvement, the CEO together with the board of FIAN will review the process following each occasion where a disclosure has been made, and will make recommendations for changes to procedures as necessary.

The terms of the policy will be revised if the needs of the organisation change or other circumstances deem it necessary.