

# Whistleblowing routines for international partners

To whistle blow is to report unlawful or unethical practices in the workplace, including violation of law or regulations, or breach of guidelines or ethical norms.

## Expectations for partner organizations

Normisjon expects that all partner organizations have an internal notification channel and routines on how to handle whistleblowing. Normisjon expects this to be known in all parts of the organization/projects.

When the partner organization has the capacity to handle whistle blowing Normisjon recommends that these should be handled internally. If the partner organization does not have the capacity, Normisjon should be involved.

The Normisjon channel can be used if the partners system of reporting is not working in the way it was intended, it feels safer to use this channel, the case is concerned to one of the people responsible for following up the report or involves Normisjon staff, or the partner is still in the process of developing a policy for this purpose.

The partner organization/projects shall **always notify** immediate superiors in Normisjon when the case concerns financial matters, when it comes to unlawful or unethical practices in the workplace, including violation of law or regulations, or breach of guidelines or ethical norms.

## Principles:

Everyone connected to a project/organization in any way connected to Normisjon can whistle blow.

The report should be sent to [Internationaldirector@normisjon.no](mailto:Internationaldirector@normisjon.no)

The international director will delegate the whistle blowing notification by setting up a case processing group.

The group should consist of minimum three persons.

Who should be in the group depends on the nature of the report:

- Eg: country manager, human resource manager, finance manager, financial controller or Digni coordinator.

The International Director gives whistle blower(s) feedback that the report has been received and about the preliminary proceedings, within 2 weeks. The international director will always notify the general secretary of Normisjon.

Responsibilities of the case processing group:

The case processing group examines the notification and decides on a further process.

A log is created (date, who, what, follow-up) and the case processing group is considering whether the notification should be forwarded to Digni.

If the case is concerned any partners receiving Digni funds, the Digni coordinator must be informed since all such information has to be shared with Digni as early as possible. In these cases, the country manager in Normisjon or the Digni Coordinator in Normisjon will be the person interacting with partner and Digni.

The case processing group will evaluate how and who to inform in the partner organization.

## Routines

### **1. Purpose and goals**

To ensure that matters worthy of criticism are uncovered and cleared up as soon as possible.

To ensure that the organization has clear guidelines for internal communication and notification.

To ensure that it is not difficult to report on matters worthy of criticism in the organization.

### **2. Responsibility**

The head of administration is responsible for the procedure.

The human resources manager is responsible for updating the procedure.

Immediate superiors are responsible for ensuring that employees in the line are familiar with the procedure

All employees are responsible for following the procedure.

### **3. Description**

#### **A. What is whistleblowing?**

To whistle blow is to report unlawful and unethical practices in the workplace or to report matters that one believes may be a cause for concern.

#### **Examples of conditions that may be relevant to notify about:**

- Failure in safety routines

- Working conditions in violation of the requirements of the Working Environment ACT, and the organization's guidelines
- Improper case processing
- Corruption and other financial fraud
- Discrimination and bullying in the workplace
- Illegal or unethical conduct
- Suspicion that sexual abuse or sexual misconduct has happened / is happening
- Suspicion that children under the care of mission/church/projects are exposed to neglect
- Suspicion that an employee exposes another to threats of violence or sexual misconduct

## **B. Why you should whistle blow?**

Section 2-4 (1) of the Norwegian Working Environment Act establishes the employee's right to whistle blow. The fact that employees report is often the only way that negative culture and illegal conditions can be uncovered. Reporting provides an opportunity to sorting out the problems and preventing them from escalating. It is therefore important that employees exercise this right when necessary.

In a good working environment, there should be a low threshold for reporting on matters worthy of criticism. At the same time, the employee must consider that the employer, working environment and colleagues must not be burdened for no reason. The employee's procedure for notification must be sound.

## **C. How to report?**

The report must be justifiable. This means that the employee must be in good faith that there exists a blameworthy condition (but it is permissible to be wrong).

The employee must use the procedures and structures that already exist in the organization in connection with handling cases of a sensitive nature. If there are no procedures in the local organization or the responsible leader is not responding adequately, this routine can be used:

It means:

- The employee must notify directly to the international director in Normisjon. The international director will notify to the general secretary in Normisjon
- The International director handles the case in accordance with the organization's procedures
- The report sent to Normisjon should be made in writing. However, there is a possibility of making the notice oral if there are reasons to do so. The report should be signed by the whistleblower.

The report should be sent to [Internationaldirector@normisjon.no](mailto:Internationaldirector@normisjon.no)

## **D. How should alert messages be processed?**

- The identity of whistleblowers is treated as confidential information.
- The case being notified should have a focus, not the person notifying.
- All allegations must be thoroughly investigated, and any matters worthy of criticism must be cleared up as soon as possible.
- The case processing group in Norway will decide how and who to inform in the partner organization and how to proceed. This will happen in coordination with partner organization.
- If the whistleblowing applies to individuals, the accusation will be taken up with the person / persons concerned who are entitled to receive information about the content of the accusation. This will normally be handled by the partner organization.
- Whistleblowers will receive feedback within two weeks after notification has been given, which measures are planned.
- Whistleblowers will receive feedback on what has happened to the case when it has been processed.
- If it turns out that there was no reason for concern / criticism, the case must be closed in a way that takes care of the person who was subjected to unfounded criticism, and the whistleblower must receive a proper explanation.
- In the case of a sexual assault case, our special coordination group for such cases will handle the whistleblowing and clarify the content of the report in accordance with the guidelines for such cases.

#### **4. Control**

Whistleblowing and follow-up of notifications shall be documented annually to the company's national board in accordance with the national board's annual plan.

Approved by:

Date: