

WHISTLE-BLOWING POLICY

For those of us involved in the management of staff, the implementation of a whistleblowing policy should be welcomed as an opportunity to encourage staff to play their part in improving the overall effectiveness and success of the organisation. By creating an atmosphere of openness and trust, good employers can ensure that their organisation as a whole is interested in eradicating unethical and illegal practices which previously may have been going on unnoticed.

1. Introduction

Sverige för UNHCR's Whistle-blowing system aims to reinforce the organisation's commitment to its policies, values, attitudes and behaviours. The system provides an alternative channel to other reporting systems to learn of serious problems so that they can be resolved quickly.

2. Policy

This policy applies to all staff of Sverige för UNHCR and those of Partner organizations who are in a long-term (over 1 year) relationship with Sverige för UNHCR. The policy covers the responsibility to report wrongful acts committed by staff of Sverige för UNHCR and those of Partner organizations. Wrongful acts in this sense are described as;

Financial and procedural malpractice including those relating to mismanagement; misappropriation of funds; actual or suspected fraud or abuse of authority.

Typically, whistleblowing happens when an employee or worker raises a specific concern, usually to their employer or an external regulator, regarding some danger, fraud or other illegal or unethical conduct that affects others, for example other workers, or members of the public. The potential organisational risks are normally greater in workplace malpractice complaints and generally do not affect the complainant personally. They are therefore different from a normal grievance or complaint in which the individual is personally affected.

Under this policy it will be a disciplinary matter if a genuine whistle-blower were to be victimised. While the policy does not specifically cover ex-employees of the organization, reports received from ex-employees will be considered for investigation. Staff are however encouraged to report any wrongful act whilst still in the employment of the organization.

3. Reporting Responsibility

It is an obligation for all Sverige för UNHCR staff to report wrongful acts or suspected wrongful acts in accordance with this Whistle-Blowing policy. Staff of Partner organisations are also required to report such acts committed by Sverige för UNHCR staff or their own staff in the execution of their Partnership agreements. Reports can be made as follows;

- Any employee of Sverige för UNHCR or that of a Partner organisation who observes any improper practice or wrongful conduct on the part of a Sverige för UNHCR staff or Partner should report such observations to the National Director.
- Where the alleged wrongdoing relates to the conduct of the National Director, the case should be reported to the Chair of the Board.
- Where the alleged wrongdoing relates to the conduct of the Chair of the Board, the case should be reported to the Sverige för UNHCR focal point person in UNHCR PSP.

- Where the alleged wrongdoing relates to the conduct of the Sverige för UNHCR focal point person in UNHCR PSP, the case should be reported to PSFR Head of Service in UNHCR.

4. Handling of Reported cases

The National Director, Chair of the Board, Sverige för UNHCR focal point in UNHCR PSP or PSFR Head of Service who receives a report will acknowledge receipt of the report within seven business days.

All reports should be properly investigated by a Committee set up by Management or an internal auditor where applicable.

Upon investigation, Management should take the appropriate corrective action warranted by the outcome of the investigation.

For investigations carried out by the UNHCR internal audit team, a report will be made to higher authority as appropriate and corrective actions will be suggested.

There may be occasions when external bodies such as donors and regulators (for example Svensk Insamlingskontroll or FRIL) will be notified of the outcome of an investigation.

The Whistle-blower would also be notified of the outcome of an investigation whenever it is possible to do so. On an annual basis, issues raised through whistle-blowing will be tracked and reported to the Board.

5. False Allegations

Any allegation which proves to have been maliciously or knowingly false will be viewed as a serious disciplinary offence. Any personal interest should be made known when first raising concerns.

6. Notification

All departmental heads and in particular Human Resource Managers are required to notify and communicate the existence and contents of this policy to the employees of their department and all new employees respectively.

National Directors should also ensure that long-term Partners are made aware of their responsibility to report any wrongful conduct of Sverige för UNHCR staff in the execution of a Partnership agreement.