Terre des Hommes
International Federation

INTERNAL REPORTING AND WHISTLEBLOWER PROTECTION

POLICY



Terre des Hommes International Federation | Chemin du Pré-Picot 3, 1223 Cologny-Geneva, Switzerland
Phone +32 2 503 64 88 | www.terredeshommes.org | coordinator@terredeshommes.org

TABLE OF CONTENT

A. INTRODUCTION 1

B. APPLICATION 1

C. SCOPE OF THE POLICY 2

D. PROTECTION 2

D.1. Prohibition of retaliation against the reporting person 2

D.2. Measures of protection against retaliation 3

D.3. Measures for the protection of the subject of concern 3

D.4. Confidentiality 4

D.5. Anonymity 4

D.6. Record keeping and personal data processing 4

E. INTERNAL REPORTING 5

E.1. Reporting channels 5

E.2. Response 6

F. EXTERNAL REPORTING AND PUBLIC DISCLOSURE 7

G. ACCOUNTABILITY 8

A. INTRODUCTION

Terre des Hommes International Federation (TDHIF) is a global non-governmental organisation comprising a network of seven (7) independent Member Organisations headquartered in Denmark, France, Germany, Italy, Luxembourg, Spain, and Switzerland.

TDHIF believes all people have a right to live their lives self-determined and free from harm and abuse and that safeguarding is fundamental to our identity as a humanitarian and development organisation. Safeguarding is the organisations' responsibility and they must ensure that staff, operations, and programmes do no harm to children, young people, or vulnerable adults, employees, or related personnel and community members.

However, we recognise the potential for ethical challenges, and we encourage employees to report any concerns or breaches of conduct they encounter. Employees are the eyes, ears and conscience of our organisations and will often be the first to spot possible wrongdoing at the workplace or in projects. By reporting concerns, individuals contribute to addressing irregularities and improving organisational practices.

The Internal Reporting and Whistleblower Protection Policy (hereinafter: the Policy) provides basic principles for reporting misconduct or concerns, explains how a report is followed up, and presents the protection that the whistleblower or any other person involved will receive within the responsibilities of TDH.

The Policy takes into account the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

B. APPLICATION

The Policy applies directly to all persons who acquire information on a suspected misconduct or breach in a work-related relationship with the TDH International Federation or Member Organisations, including but not limited to:

- All employees of the International Federation;
- All employees of any TDH international entity and all offices under the responsibility of such TDH entity (i.e. regional/sub-regional offices, country offices, fundraising/advocacy offices) that do not have their own whistleblowing policies and procedures;
- Related personnel including board members, volunteers, interns, visitors, consultants, community volunteers and incentive workers.

The Policy also applies to persons who report information on a suspected misconduct or breach acquired:

- In a work-based relationship with TDH that has since ended;
- During the recruitment process or other pre-contractual negotiations.

While TDHIF is open to receiving and investigating reports of concerns or allegations from any person or entity that comes into contact with its activities or the activities of its Member Organisations, whistleblower protection only applies to its employees and related personnel as mentioned above.

All TDH Member Organisations shall develop their own Internal Reporting and Whistleblower Protection Policy complying with the principles stated in the TDHIF Policy.

C. SCOPE OF THE POLICY

TDHIF determines with this document the principles and key steps of reporting and the procedure for the protection of persons who report both violations of TDH codes of conduct and policies, and violations of national regulatory provisions and laws.

For TDH Member Organisations established in EU Member States, the provisions of the Directive 2019/1937 of the European Parliament and of the Council regarding violations of European Union law also apply.

Persons who have observed a misconduct or have reasonable suspicion of a misconduct are required to file a report promptly and as soon as they become aware of it. Reporting breaches of the policies is a duty for all persons falling under the application of this policy. Failing to report may result in disciplinary measures.

The Policy applies to reports of the following nature:

- Behaviours involving administrative, accounting, civil, or criminal misconduct or activities that violate national, European, and international laws;
- Behaviours that put the health and safety of colleagues and/or beneficiaries at risk;
- Unauthorised use of the organisation's funds;
- Potential fraud, scam, extortion, or corruption;
- Sexual exploitation and abuse; sexual harassment;
- Aggression and violence; discrimination, harassment, and bullying;
- Trafficking in persons;
- Computer crimes, illicit use of personal data;
- Other behaviours in violation of TDH codes of conduct, policies, procedures, and regulations.

D. PROTECTION

D.1. Prohibition of retaliation against the reporting person

TDH will protect the whistleblower from any harassment or retaliation (including informal pressure) at the workplace. The use of one’s position to prevent, dissuade, or discourage persons within the scope and application of the Policy from exercising their duty to report or from lending assistance to reporting persons is prohibited.

Those who raise a concern in good faith, believing, based on the circumstances and information available to them at the time, that what they are reporting is true, will not incur any sanction even if the allegations are then proved to be unfounded.

This condition is crucial to prevent false or malicious reports, and it also safeguards those who may report inaccurately due to an honest mistake.

Given that there may be reasons for dismissing a whistleblower (project termination, redundancies, poor professional performance) that are unrelated to the report itself, if the whistleblower believes that he, she or they have been retaliated against, he, she or they may report it using the internal channels but will have to prove the connection between the report and the adverse action suffered. Similarly, the employer will have to prove their reasons for the dismissal and that these are not connected to the report.

D.2. Measures of protection against retaliation

TDH ensures that persons falling within the scope and application of the Policy are afforded the most effective protection possible against any retaliation of reprisals, whether actual, attempted or threatened.

Persons (i.e. reporting persons or those who assist a reporting person) who believe they have been victims of retaliation or have reasonable reasons to believe that they are exposed to a risk of retaliation, should immediately report the matter to their preferred point of contact at TDH or through the reporting channels.

The complaint will be treated as strictly confidential and must contain the respective facts supported by information or documentation. A causal link between the report and the alleged retaliation must be established by the individual filing the complaint of retaliation. TDH assesses the complaint without undue delay and may launch an inquiry. The outcome of the complaint is totally independent of that of the report itself: reporting persons do not lose protection under the Policy if their complaint of retaliation cannot be substantiated.

Protection measures include:

- No retaliation: suspension, lay-off, dismissal or equivalent measures; demotion or withholding of promotion; transfer of duties, change of location of place of work, reduction in wages, change in working hours; withholding of training; a negative performance assessment or employment reference; imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty; failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he, she or they would be offered permanent employment; failure to renew, or early termination of, a temporary employment contract;
- No coercion, intimidation, harassment or ostracism;
- No discrimination, disadvantageous or unfair treatment;
- No harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
- No blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
- Early termination or cancellation of a contract for goods or services;
- No psychiatric or medical referrals.

D.3. Measures for the protection of the subject of concern

The subject of concern shall fully enjoy the presumption of innocence and the right of defence. Their identity will be protected to the extent possible, and they have the right to be heard and, where appropriate, the right to access their file.

D.4. Confidentiality

The identity of the **reporting person** (if known) is not disclosed to anyone beyond the designated TDH staff members competent to receive or follow up on reports, unless:

- That person gives his/her/their explicit consent;
- TDH is required to do so as per EU law or national law in the context of investigations by national authorities or judicial proceedings;
- It is essential for the accused persons to be able to defend themselves.

Reporting persons will be informed before their identity is disclosed, and the reasons for such disclosure, unless such information would jeopardise the related investigations or judicial proceedings.

The identity of the **subject of concern** is also protected and remains confidential. Such identity is only known to people who are involved in the handling of the report, at the very least in the initial phases of the investigation. The identity may be disclosed if TDH is obligated to do so, for instance pursuant to EU or national law in the context of investigations by national authorities or judicial proceedings.

The underlying facts of the report remain confidential. They are only known to the people who are involved in the handling of the report.

D.5. Anonymity

TDH invites those who report to include their name in the report. There will not be consequences, and it will allow a more open exchange.

Anonymous reports will have less weight but may still be taken into consideration, at the discretion of each TDH Member Organisation.

The following criteria could be used to decide if an anonymous report can be considered:

- The seriousness of the issues raised;
- The credibility of the report;
- The probability of receiving confirmation of the report from other non-anonymous sources.

D.6. Record keeping and personal data processing

The processing of personal data within the framework of the Policy will be carried out in accordance with EU Regulation 2016/976 and relevant national legislation, or in accordance with national legislation and international standards in countries where EU regulations do not apply.

Personal data which are not relevant for the handling of a given report will not be collected or, if accidentally collected, will be deleted without undue delay.

Reports shall be stored for no longer than is necessary and proportionate to comply with the requirements imposed by applicable legislation and procedures.

E. INTERNAL REPORTING

TDH requires all persons falling under application of this policy to first report information on a suspected misconduct or breach through the internal reporting channels established by their respective TDH organisation. It is always possible to report directly to the International Secretariat should the person have reasonable doubts that their own organisation may not follow up on their report.

Persons who report information on breaches may choose to do so either in writing or orally.

In the case the information is given orally, a report will be drawn up or a transcription used by which the reporter will have the opportunity to verify, modify and approve.

E.1. Reporting channels

TDHIF and each TDH Member Organisation will establish their internal reporting channels and procedures. Internal reporting channels can be chosen depending on the requirements of national legislation, internal procedures and the structure of the organisation, always with a view towards transparency and accountability.

Below are some non-exhaustive examples of appropriate internal reporting channels:

- **Secure digital platforms:** These portals ensure the protection of the identity of the reporting person, as well as the information contained therein. Non-authorised staff members do not have access to the portal, as access is restricted and only granted on a need-to-know basis. Where the EU directive applies (EU countries and entities with over 50 staff members), a secure digital platform should be chosen as the main reporting channel.

- **External ombudspersons:** The organisation entrusts competent professionals, external to the organisation, with the collection of reports and the investigation of the reports received.

- **Hotlines:** Persons who fall within the scope of the Policy may also report the matter orally through designated hotlines or through digital platforms.

- **Confidential email:** The reporting of information on breaches may also be made to a dedicated email address with two authorised respondents from the organisation.

- **Meeting in person or online:** Persons who fall within the scope of the Policy may report the matter requesting a meeting, in-person or online, with TDH's focal points or to other designated persons within each one of TDH's Member Organisation offices. The meeting could also be requested to the line manager or HR manager. This depends, however, on the severity and sensitivity of the issue raised and who is suspected of the breach.

Other channels may be established according to the structure of each organisation, but they must guarantee confidentiality, accessibility and be managed by a designated trained external person or by two authorised staff members from TDH with different positions of power within the organisation.

The reporting channels of TDHIF and each TDH Member Organisation can be found on the respective homepages.

E.2. Response

While each TDHIF member will establish their own case management procedures, considering local regulations and requirements, it is requested that they do not fall below the following standards.

Reporting office

The International Federation and each TDH Member Organisation designate an impartial person, department, or external office (e.g. law office) that is competent for receiving reports as the official reporting office. Ideally, this person should not be the head of the organisation unless they are supported by a second staff member.

A member of the WG Safeguarding can take up the role of the designated person receiving sensitive reports for the International Federation.
The designated person or department first classifies the nature of the report, that means assesses what type of complaint it is and whether it is a credible report and can be taken into consideration. If the report is unreliable, petty and cannot be verified from other sources it will be declined without any notice.

In any other case the designated person or department acknowledges the receipt of the complaint possibly within seven days after reception and takes the next steps. The next steps could be forwarding the case to the designated person of the respective Member Organisation dealing with such a case (focal person, case manager) if it is not the same person receiving the complaint.

It will be the designated person who will maintain communication with the reporting person and, where necessary, ask for further information and evidence and provide feedback to that reporting person.

Timeline

Acknowledgement of receipt should be sent within **seven days** from the receipt of the report by the designated person or department. Depending on the case, information on how the issue will be addressed and an estimate of the time needed to give a final response will be included.
Within **three months**, feedback to the reporting person shall be provided.

Process

1. Follow-up (or pre-investigation)
Before any feedback is given, TDH will seek to collect as much information as possible to understand the nature of the concern or allegation, and to map out the situation. This is usually done by way of an intake interview with the reporting person, handled by the case manager (designated person or department within TDH, or external office).

In safeguarding cases, if the report comes directly from the victim, the person handling the report shall listen, support and if needed, promptly refer the affected person to relevant services of their choice, with their consent or the consent of a caregiver or guardian in the case of a minor, using appropriate Gender-Based Violence/Child Protection referral pathways.

Normally, an intake interview report is drafted and submitted to the reporting person who will check, correct, and sign for approval.
An initial assessment is then diligently conducted based on the information provided and available. Such assessment is carried out according to the applicable laws, regulations, and any internal policies and procedures. Information gathering within this first stage is done in a way that does not jeopardise a potential investigation or present a protection risk to anyone involved.

2. Feedback
Based on the elements gathered during the pre-investigation, a decision is made by TDH on the next steps. As such:

- The report can be resolved within the department or country office by the responsible manager: In consulting the reporting person, the case manager (designated TDH person or department) coordinates with management on the steps to be taken to address and remedy the given misconduct or breach;

- The report needs further investigation: TDH will set up an internal committee whose members shall be free of any conflict of interest with the reporter, or the person concerned. Committee members receive access to the details of the case and discuss it. The Committee will decide on the best, most effective course of action. This will be shared with the reporting person before any action is implemented that may require disclosure of their identity or need their consent. Any person falling within the scope and application of the Policy has the duty to cooperate in any inquiry or investigation on the reported information;

- The matter contained in the report does not fall within the scope of the Policy: The reporting person will be referred to the appropriate department within TDH (HR, etc.) and/or the relevant national authority (law enforcement, etc.). In such cases, detailed information will be provided to the reporting person.

3. Outcome of an investigation
When the filing of a report has led to the opening of an investigation, the findings are ultimately laid out in a detailed investigation report. On that basis, a conclusion will be drawn as to whether the underlying facts of the report constitute a breach to the TDH Code of Conduct and Policies, values, or any other internal regulations.

In case of a violation, TDH decides on the next course of action. This may include disciplinary measures or any type of measure as TDH sees fit.

The reporting person and the person concerned by the report are informed of the outcome of the investigation. However, TDH may not always be able to provide further details for reasons of confidentiality, privacy, and/or legal rights of the parties involved.

F. EXTERNAL REPORTING AND PUBLIC DISCLOSURE

Exclusively with regard to TDH organisations based in EU Member States and subject to the EU Directive 2019/1937 and relevant national laws, access to external reporting channels may be available as established by each EU Member State. External reporting channels may only be used to report specific violations of European Union law and national regulatory provisions and only when a report made was not followed up or there are reasons to believe that an internal report would not be followed-up or could lead to the risk of retaliation.

Staff may resort to public disclosure when no appropriate action was taken after reporting internally and externally or when they have reasons to believe that there is an imminent or manifest danger to the public interest or when due to the particular circumstances of the case (as for example collusion of the authorities or risk of destruction of evidence) there is a high risk of retaliation or of the breach not being addressed.

If public disclosure is unjustified or has malicious intent, TDH will take appropriate action against the person who disclosed the information, including seeking legal action.

G. ACCOUNTABILITY

All TDH members shall report annually to the TDH General Assembly the number of sensitive complaints received according to the nature of the complaints and whether they are still open or closed.

Approved by the International Board of TDHIF: 21 March 2025
Revised in October 2026