

# Whistleblowing Policy

## Table of contents

---

<b>1. Why</b>	<b>2</b>
<b>2. Policy</b>	<b>2</b>
<b>3. Background</b>	<b>2</b>
<b>4. Principles</b>	<b>3</b>
<b>5. Procedure</b>	<b>3</b>
<i>a. Stage 1</i>	<i>3</i>
<i>b. Stage 2</i>	<i>4</i>
<i>c. Stage 3</i>	<i>4</i>
<b>6. Other Policies</b>	<b>4</b>
<b>7. Location and Access to the Policy</b>	<b>5</b>

## 1. Why

---

Whistleblowing is when someone who works in or for an organization passes on information which they reasonably believe shows wrongdoing by that organization. It is important that individuals feel safe and listened to when raising concerns. From the organization's point of view, it gives a good opportunity to stop poor practice at an early stage before it becomes normalized and serious incidents take place.

## 2. Policy

---

This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with. This policy will be reviewed annually.

## 3. Background

---

It is important that any fraud, misconduct or wrongdoing by staff or others working on behalf of the charity is reported and properly dealt with. We therefore require all individuals to raise any concerns that they may have about the conduct of others in the charity or the way in which the organization is run.

The Public Interest Disclosure Act 1998 provides protection for workers who raise legitimate concerns about specified matters in the public interest. These are called 'qualifying' or 'protected disclosures'. A qualifying disclosure is made by someone working on behalf of the charity who has a reasonable belief that any of the following is being, has been or is likely to be, committed:

- A criminal offence
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- A breach of any other legal obligation
- Concealment of any of the above

It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed – a reasonable belief is sufficient. You have no responsibility for investigating the matter – it is the charity's responsibility to ensure that an investigation takes place. If you make a protected disclosure you have the right not to be dismissed, subjected to any other detriment or victimized because you have made a disclosure. We encourage you to raise your concerns under this procedure in the first instance.

## 4. Principles

---

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Staff and others working on behalf of the charity should be watchful for illegal or unethical conduct and report anything of that nature that they become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- No employee or other person working on behalf of the charity will be victimized for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the worker will not be prejudiced because they have raised a legitimate concern.
- Victimization of an individual for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure, our disciplinary procedure will be used, in addition to any appropriate external measures.
- Maliciously making a false allegation is a disciplinary offence.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a coordinator, you should not agree to remain silent. You should report the matter to the chief executive or the chair of the board of trustees.

## 5. Procedure

---

### a. Stage 1

---

In the first instance, any concerns should be raised with the OHF Safeguarding Officers Sifiso Khumalo ([fifie@ohf-lesvos.org](mailto:fifie@ohf-lesvos.org)), Maria Lazari ([selin@ohf-lesvos.org](mailto:selin@ohf-lesvos.org)), Ivan Rivera ([ivanrivera@ohf-lesvos.org](mailto:ivanrivera@ohf-lesvos.org)) or Carlotta Passerini ([carlotta@ohf-lesvos.org](mailto:carlotta@ohf-lesvos.org)) who will arrange an investigation of the matter. The investigation may involve you and other individuals involved giving a written statement. Any investigation will be carried out in accordance with the principles set out above. Your statement will be taken into account and you will be asked to comment on any additional evidence obtained. The Safeguarding Officer will take any necessary action, including reporting the matter to the chair of the board of trustees and any appropriate government department or regulatory agency if applicable. The Safeguarding Officer will also invoke any disciplinary action required. On conclusion of any investigation, you will be told the outcome and what the charity has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

## b. Stage 2

---

If you are concerned that the OHF Safeguarding Officers are involved in the wrongdoing, have failed to make a proper investigation or have failed to report the outcome of the investigation to the relevant person, you should escalate the matter to any other board member(s) of OHF. The board member(s) will arrange for a review of the investigation to be carried out, make any necessary enquiries and make their own report to the board. The board member(s) will also take any necessary action, reporting the matter to any appropriate government department or regulatory agency if applicable. The board member(s) will also invoke any disciplinary action required in cooperation with the coordination team on the ground. On conclusion of the review, you will be told the outcome and what the charity has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

### OHF Board members – Contact List

Fabian Bracher, [fabian@ohf-lesvos.org](mailto:fabian@ohf-lesvos.org)  
Jael Tobler, [jael@ohf-lesvos.org](mailto:jael@ohf-lesvos.org)  
Fanny Oppler, [fanny@ohf-lesvos.org](mailto:fanny@ohf-lesvos.org)  
Lukas Oppler, [lukas@ohf-lesvos.org](mailto:lukas@ohf-lesvos.org)  
Hannah Bäschlin, [hannah@ohf-lesvos.org](mailto:hannah@ohf-lesvos.org)  
Johanna Käser, [johanna@ohf-lesvos.org](mailto:johanna@ohf-lesvos.org)

## c. Stage 3

---

If on conclusion of stages 1 and 2 you reasonably believe that the appropriate action has not been taken, you should report the matter to the relevant body. This could include:

In Switzerland:

- Cantonal Police, e.g. Police of the Canton of Bern: <https://www.police.be.ch/>
- Swiss Federal Office of Police: <https://www.fedpol.admin.ch/fedpol/en/home.html>
- Federal Department of Foreign Affairs: <https://www.eda.admin.ch/eda/en/home.html>
- Any foreign representation of Switzerland:  
<https://www.eda.admin.ch/eda/en/home/representations-and-travel-advice/foreign-representations-in-switzerland.html>

In Greece:

- Hellenic Police: <http://www.astynomia.gr/>

## 6. Other Policies

---

- OHF Code of Conduct






- OHF Safeguarding Policy
- OHF Data Protection Policy (to be established)

## 7. Location and Access to the Policy

---

This document is located on the shared Google Drive of One Happy Family. A link to the document, and a digital or printed copy can always be requested from the Coordination Team.

Persons responsible for the Policy:

Name:	Date:	Signature:
Selin Maria Lazari (safeguarding officer on the ground)	11.2.21	
Fifie Sifiso Khumalo (safeguarding officer on the ground)	11.2.21	
Paolo Vanni (safeguarding officer on the ground)	4.7.21	
Ivan Rivera (safeguarding officer)	15.11.20	
Carlotta Passerini (safeguarding officer)	15.11.20	

Adopted on: August 2019

Last review date: November 2020