
Whistle Blowing Policy

(Attachment to Code of Conduct)

1. What is the purpose of this policy?

1.1 This policy covers the steps to take when you feel you have identified or observed conduct in the organisation that contravenes the Code of Conduct.

2. Why does Plan have a Whistle Blowing Policy?

2.1 This policy provides a recognised means of raising concerns internally within the organisation. As Plan staff and associates, we are usually the first to be aware of any malpractice, fraud, negligence, or illegality and we must be able to raise legitimate issues in an open and honest way without fear. Open communications, rather than anonymous letters, are more likely to be taken seriously; can be acted on more rapidly and will therefore produce more effective results.

2.2 The Whistle Blowing Policy draws particular attention to Plan's policies on Child Protection, and Fraud and Malpractice as follows:

Child Protection

2.3 As an indication of what we consider might be raised through the Whistle Blowing Policy, Plan's definition of child abuse as set out in the global Child Protection Policy is:

- Sexual abuse or other physical or mental harm deliberately caused to a child. A *child* means every human being below the age of eighteen years.

2.4 It is important that you refer to the Global Child Protection Policy and the related country/regional guidelines and procedures for more information.

Fraud and Malpractice

2.5 It is also important to emphasise in this document that Plan has a policy of zero tolerance towards fraud. We want to ensure that Plan's reputation as a quality organisation is maintained and that the maximum possible funds are used to the benefit of the children, families and communities with whom we work.

2.6 As an indication of what we consider might be raised through the policy, Plan's definition of fraud as set out in the Field Operations Book is:

- An action or an intentional omission, coupled with an element of deception, that enables someone to receive benefit directly or indirectly whether financial or non-financial at the expense of Plan or others involved with Plan.

2.7 Malpractice is considered to be:

- Any other intentional contravention of the Code of Conduct or the Conflict of Interest Policy.

3. Procedure

3.1 If you believe, in good faith, that you have uncovered or observed evidence that indicates child abuse, fraud, malpractice or any other breach of the Code of Conduct, you are expected to report it, with the supporting factual evidence to:

- Your Country Director or, if you believe your Country Director is involved or implicated in any way, your Regional Director (if you are in IH this should be to your Departmental Director) or the National Director. In cases of alleged child abuse, you shall report these in the first instance to the designated Child Protection Officer in your Country/Region, who will advise the Country or Regional Director.

3.2 If you consider that your concern may not be taken seriously through this route, you may, alternatively go outside the line management structure and raise your concern with the Director of Audit or the Director of Human Resources.

- If the complainant is not satisfied with the outcome he can present an appeal for final decision to the next level of management
- Associates can voice their concern through the above channels or via the 'Contact us' link on www.plan-international.org.
- Complaints can be made on behalf of affected parties where necessary, but only with the affected parties proven consent

3.3 Confidentiality is assumed unless you agree that your identity may be revealed. In respect of allegations of child abuse, it is important to remember that the best interests of the child are paramount. A breach of confidentiality could have devastating effects on the life of a child and the child's family.

4. Action to be taken

4.1 All concerns raised under this policy will be dealt with promptly and will be treated seriously and sensitively.

4.2 Your concerns will be discussed with you in order to help determine the precise action to be taken. It will be for the manager with whom you have raised the concern to decide whether or not to involve other parties to investigate (e.g. where there is an issue of alleged child abuse or fraud, an investigation must be carried out. Please see the Child Protection Policy and related local guidelines and procedures, and the Field Operations Book respectively for further detail).

4.3 Whenever possible, resolution will be reached and the outcome known within 28 days of raising the concern. You will be informed of the action taken and the outcome.

4.4 If you have raised a legitimate concern in good faith and an investigation finds the concern to be unfounded no action will be taken against you for 'whistle blowing'.

5. Penalties

5.1 Anyone who victimises an employee for raising a legitimate concern or tries to deter someone from raising a legitimate concern will be subject to disciplinary action.

6. Retaliation

6.1 Retaliation is defined as any direct or indirect detrimental action recommended, threatened, or taken towards an individual who has reported a complaint under the whistle blowing policy.

6.2 Plan will not accept any retaliation against person(s) who have made complaints under this policy.

6.3 Plan will take appropriate measures to ensure that the effects of retaliation are reversed.

6.4 Plan will enforce mandatory discipline against staff members and associates where retaliation is proven to have taken place.

6.5 Anyone who makes false and malicious accusations or who raises concerns for personal gain will also be the subject of disciplinary action.

7. Leadership.

7.1 Responsibility for overseeing compliance with this policy is with the Chief Executive Office.