

WHISTLEBLOWER POLICY

The Boat Refugee Foundation (BRF) whistleblowing policy encourages and protects staff members (paid or unpaid) who in good faith¹ report any serious concern about behaviour in the workplace that could be illegal, dishonest, fraudulent, unethical or in violation of the policies of the organisation. The policy applies to all countries and locations in which BRF operates.

This policy is not intended to deal with any form of abuse or exploitation involving staff members (including volunteers), beneficiaries, or any organisation that BRF works with. To report abuse or exploitation we refer to BRF's reporting procedures in our Safeguarding Policy.

1. REPORTING

It is the responsibility of all staff members, including volunteers, to report any (suspected) activity by people within the organisation that could be illegal, dishonest, fraudulent, unethical or in violation of the policies of the organisation, while ensuring to provide all relevant facts. Any intentional action to cover up a report about a serious concern is a serious disciplinary offence.

It is not necessary to have hard proof to make a report, a reasonable concern is sufficient. The report must be made in good faith to avoid baseless allegations. Any report made in good faith will not lead to consequences for the person reporting, even if after investigation no ill-doing is found or proven. However, a report which proves to have been made maliciously or knowingly to be false is in itself a violation of BRF's policies and will be viewed as a serious offence and could lead to disciplinary measures.

Step 1 - Employees should first inform their line-manager or supervisor about any serious concerns. If you feel uncomfortable about reporting a serious concern to your line-manager or supervisor, or if you have a reasonable belief that they are part of the serious concern, proceed with step 2.

Step 2 - Report directly to the Safeguarding and Compliance Officer (SCO) with this form. The SCO will raise this with the Safeguarding and Compliance Committee, which consists of a member of the HQ Programmes Team, the Human Resources Manager and a member of the Management Team (MT), who will start an investigation.

Niska Stoker	SCO	safeguarding@boatrefugee.com
Simone van der Velde	Human Resources	simone@bootvluchteling.nl
Esther Vonk	Director	esther@bootvluchteling.nl

Step 3 - If you are concerned that the Safeguarding and Compliance Committee has failed to initiate a proper investigation or has failed to inform the relevant people of the outcome of an investigation, report to the members of the Supervisory Board in writing (email).

¹ Seriously believing that what you are doing is right, honest, or legal, even though this may not be the case.



Miguette Jadoul	Chairperson	raadvantoezicht@bootvluchteling.nl
Ilse Westerbeek	Board member	raadvantoezicht@bootvluchteling.nl
Pieter van Essen	Board member	raadvantoezicht@bootvluchteling.nl
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Step 4 - If you reasonably believe that the results of step 1 until 3 did not lead to appropriate action to correct the serious concern, report the matter to (local) authorities.

As a whistleblower, you are not responsible for (further) investigating the serious concerns raised. All investigations will be conducted in a fair, independent and timely manner² and all reasonable efforts will be made to preserve confidentiality during the investigation. Where possible, the whistleblower will be provided with feedback on the progress and expected timeframes of the investigation.

The person against whom any allegations have been made will also be informed of the concerns and will be provided with an opportunity to respond, unless there are any restrictions or other reasonable grounds for not doing so. The person against whom any allegations have been made must cooperate during an internal or external investigation and hearings.

Serious concerns may be reported anonymously through the reporting online form (bit.ly/3YoBtHl)³. Please be aware that it might be difficult to properly investigate if a report is submitted anonymously, however you are not required to share your identity when making a disclosure.

² If possible within 3 weeks.

³ Alternatively, a report could also be filed through an anonymous email service such as [CyberAtlantis](#) or [Anonymouse](#) (use at own risk).



2. NO RETALIATION

It is not in line with BRF's values to retaliate against any person who, in good faith, reports any activity by a staff member of the organisation that could be illegal, dishonest, fraudulent, unethical or in violation of the organisation's policies. Anyone within the organisation who retaliates against someone who has reported a violation in good faith is subject to disciplinary action.

3. FOLLOW-UP AND RESULTS

To the extent permitted by law, the Safeguarding and Compliance Officer, Director or Supervisory Board may inform you, as a whistleblower, and/or a person against whom allegations have been made of the results of the investigation. The organisation will document the findings of an investigation in a report, however, any report will remain the property of the organisation and will only be shared with you or any person against whom the allegations have been made if the organisation deems it appropriate.

If misconduct is discovered through an investigation under this procedure, BRF's disciplinary procedure will be applied in addition to any appropriate external measures.