

# Kerk in Actie

## Whistleblower Procedure

<b>Procedure owner:</b> Integrity Officers	<b>Date:</b> April 18th 2024	<b>Approved</b>
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<b>Final check:</b> Kerk in Actie MT	<b>Date:</b> April 18th 2024	<b>Approved</b>
<b>Starting date:</b>	<b>April 18th 2024</b>	<b>Classification:</b> <b>Public</b>

### 1. Purpose

It is the aim of Kerk in Actie to be a reliable and transparent organisation. This means that Kerk in Actie wishes to treat wrongful acts exposed by a whistleblower seriously. This procedure should give guidance to staff and the whistleblower on how Kerk in Actie handles wrongful acts committed by staff of Kerk in Actie or people who represent Kerk in Actie.

### 2. Definitions

GIMD	Joint Institute for Social Services (Gemeenschappelijk Instituut voor Maatschappelijke Dienstverlening )
MT	Management Team
Whistleblower	A whistleblower is a person who exposes secretive information or activity within Kerk in Actie that are deemed wrongful acts committed by staff of Kerk in Actie or people who represent Kerk in Actie and are victimised by Kerk in Actie because of it. Wrongful acts in this sense are described as: - Financial and procedural malpractice including those relating to mismanagement, misappropriation of funds, actual or suspected fraud, abuse of authority and non-compliant behaviour with the Kerk in Actie and ACT Codes of Conduct

- HR related matters, such as (sexual) harassment, bullying, aggression, violence and discrimination

Under this policy, it will be a disciplinary matter if a genuine reporter were to be victimised.

### **3. Responsibilities**

#### **External Complaint officer**

The External Complaint Officer is responsible to handle the reported case with strict confidentiality. By advising the whistleblower, making sure the issue is investigated properly, the necessary actions are taken and the rights of the whistleblower are protected.

### **4. Description**

#### **4.1 General**

This policy provides protection of the rights of the whistleblower of wrongful acts of staff of Kerk in Actie or people representing the organisation.

This policy applies to the staff of partner organisations and the involved beneficiaries of Kerk in Actie's projects. The policy covers the responsibility to report victimisation by Kerk in Actie due to the report of wrongful acts committed by staff of Kerk in Actie or people who represent Kerk in Actie.

Kerk in Actie staff who believe that his/her rights are violated can make a formal complaint in accordance with the Protestantse Kerk HR Complaints procedure. Externally with the 'vertrouwenspersonen' or internally at the klachtenformulier on the Protestantse Kerk website.

#### **4.2 Reporting responsibilities**

Members of staff of partner organisations and beneficiaries are required to report victimising due to reporting wrongful acts committed by Kerk in Actie-staff or people representing Kerk in Actie to the External Complaint officer at GIMD.

You can contact them during Dutch office hours by phone on +31 (0) 88 8008524 or via email: [meldpuntgoededoelen@gimd.nl](mailto:meldpuntgoededoelen@gimd.nl)

You can contact them in Dutch, English, Spanish, Portuguese and French and they will reply to your email within 1 workday.

#### **4.3 Handling of reported cases**

Cases are always handled with strict confidentiality. Reports can also be made on an anonymous basis. The confidentiality and anonymity of the reports will be kept to the maximum extent possible, consistent with the need to conduct an adequate investigation. The person who reports the case has the right to be protected to any form of disadvantage because of his/her report. How this person can be protected in the best way differs per case and will therefore be decided per case. There is always the possibility that there might be consequences for the whistleblower.

**4.4 Procedure for whistleblowers**

To submit a complaint or appeal about the behaviour or a decision of Kerk in Actie staff members or people representing this organisations please see the Complaints and appeal procedure Kerk in Actie for partners. When Kerk in Actie is suspected of victimising the reporter because of the report made, the external Complaint officer will first contact Kerk in Actie and try to solve the situation. If this is insufficient the external complaint officer will forward the situation to the ‘Huis van de Klokkenluiders’, the “Home of Whistleblowers” to investigate the situation.

On a three months basis, issues will be tracked and reported to the Kerk in Actie MT in the annual report of the Integrity Officer. Kerk in Actie also reports all cases in its annual report.

**5. Risk analysis**

For each process the possible risks will be described. The aim is to eliminate the risk or reduce it to an acceptable level. The implementation is described in procedure P02 - Risicomanagement (Risk Management). The risks are described in form F02 - Risico analyse (Risk analysis).

**6. Materials and methods**

Linked work instructions, forms or lists.

**7. References**

ISO 9001:2015, Partos ISO 9001:2015 and CHS

**8. Attachments**

None

**9. Document changes**

Revision	Date	Changes
01	01-2021	First release
02	04-2024	<ul style="list-style-type: none"> <li>- Procedure owner set to Integrity Officers</li> <li>- Added 1. Purpose</li> <li>- Added GIMD and MT to 2. Definitions</li> <li>- Added External Complaint Officer to 3. Responsibilities</li> <li>- 4.3 added: <i>There is always the possibility that there might be consequences for the whistleblower.</i></li> <li>- 4.4 HR and Business Controller deleted out of annual report of the Integrity Officer</li> </ul>
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