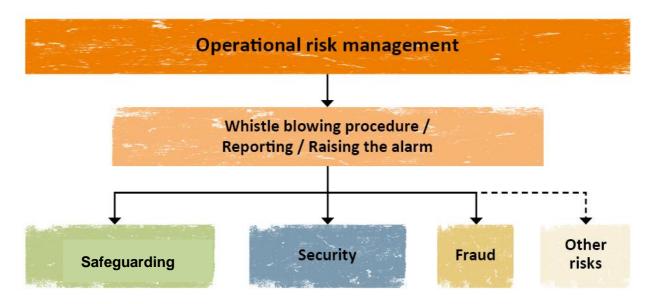
Operational Risk Management



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Whistle Blowing Procedure





1. Child Safeguarding Policy

1. Whistle Blowing Procedure

Any abuse of Terre des hommes child beneficiaries must be reported to your line manager at your place of work (delegation or work base) or to the local focal point for the **Child Safeguarding Policy (CSP)**.

This person will report the suspicion and/or allegations to the Country Representative responsible in the country of posting for the correct application of the CSP and for managing reporting.

All staff are informed about and educated on the CSP.

We all therefore need to monitor each other, and it is the responsibility of all staff to report any suspected or confirmed improper behaviour towards a child.

If necessary, any member of staff can directly contact Tdh headquarters through the Risk Advisor without having to go through his or her line manager or the Country Representative (see below).



The Steering Committee will consist of :

- General Director
- Program Director
- Deputy Program Director
- Human Resources Director
- Risk Management Advisor
- Head of Communication (on request)



2. Roles and responsibilities (in the field and at headquarters)

Responsibility for the CSP in the Tdh country of intervention lies with the Country Representative. In consultation with their staff, Country Representatives will draw up action plans designed to ensure familiarisation with and understanding, distribution, implementation and adaptation of the CSP within their delegations.

Country Representative,

aided by specially set-up CSP committee :

- Will ensure that implementation of the CSP action plan is properly monitored throughout the year
- Will oversee monitoring of any instance of child abuse within his or her delegation
- Will inform headquarters in the event of any instance of child abuse

Program Manager (PM):

- Will ensure that CSP action plans are carried out in his or her Geographic Zone
- Will oversee the monitoring of these action plans during field visits
- Will be informed of any instance of child abuse in his or her Zone
- Depending on the seriousness of the case, will be part of the committee managing the breach of the CSP

Tdh Staff:

- Will comply with the Child Safeguarding Policy and its code of conduct
- Will report any form of suspected or confirmed child abuse in the field

Tdh CSP focal point:

- Will provide a local point of contact
- Will advise, support and assist country teams in the implementation of the Child Safeguarding Policies and Procedures

Risk Management Advisor:

- Will offer delegations technique expertise and support in managing / implementing the
- In the event of suspected abuse, will oversee management of the case, along with the Country Representative, until the case is formally closed
- Will coordinate the Crisis Management Committee

3. Raising awareness and implementation in the field

All staff, at headquarters and in the field, will sign the code of conduct and the declaration of compliance with the Tdh CSP.

All Tdh members are made aware on an ongoing basis of the CSP and, on a general basis, of the Convention on the Rights of the Child.

CSP posters are available at all Tdh delegation bases. These posters give the name of the Tdh focal points in charge of each office (base) to whom allegations of breaches of the CSP should be reported.

This same manager will ensure that references are taken up when recruiting any new member of staff in the field and will oversee monitoring of any CSP cases that may arise.



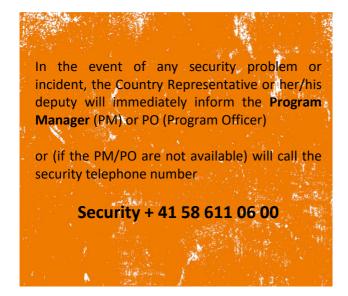
2. Security and Safety

Security and Safety relate to all events that have a direct impact on Tdh staff and activities, and risks that can arise at any time and in any place affecting the lives of us all.

1. Whistle Blowing Procedure

- The Program Directorate and the General Director will be informed of any serious security and safety incidents
- The Operations Directorate, the Zone and the Risk Advisor will decide whether to activate the Crisis Management Team on the basis of the seriousness of the incident and the need for monitoring
- For every serious incident the Crisis Management Plan will be followed and a Strategic Committee will be opened accordingly

- The Media Responsible will be informed by the Head of Communication
- For every security incident taking place in the field, an incident report (following the organisation's framework) must be completed by the person in the field responsible for security and sent to the Geographic Zone and the Risk Advisor



The Crisis Management Team will consist of:

- Deputy Program Director
- Program Manager (or officer)
- Senior HR partner
- Head of Communication and/or the Media Responsible (on request)
- Risk Management Advisor

A Strategic Committee can also be opened.



2. Roles and responsibilities (in the field and at headquarters)

Country Representative:

- Will analyse risks affecting her/his country or region of posting
- Will establish risk-reduction measures
- Will raise awareness among all Tdh staff, including new recruits (on long and shortterm contracts) of the country security
- Will draft incident reports and ensure that they are monitored

Program Manager:

- Will validate the security plan
- Will receive reports on and monitor incidents in the field
- Will inform staff at headquarters of the security situation in the country

Tdh Staff:

- Must be familiar with the Tdh security and safety policy, including the Tdh security principles
- Will comply with this policy, as well as the security policy for the country

Program Directorate:

- Will decide on the make-up of the Crisis Management Team following recommendations from the Risk Advisor and the Program Manager
- Participate in better case monitoring and support

Risk Management Advisor:

- Will provide technical support and expertise on the security plan
- Will keep centralised records of all security and safety incidents
- Will inform the Operations Directorate of serious incidents

3. Raising awareness and implementation in the field

All Tdh staff must be informed about the Security policy, including the security principles, the security and safety plan and the internal security rules in force in the country where the staff is located. The Tdh security policy must be communicated to all staff.

All Tdh staff (headquarters, consultants, visitors, backers, etc.) must receive a security briefing on departure (general: HR and Zone) and on arrival in the country (specific to the country and the security plan in force), regardless of their role.

Ongoing training for local staff must be implemented to raise awareness of Tdh's security culture.

In the country, the Country Representative is the person with responsibility and decision-making power.



3. Fraud / Corruption

The Terre des hommes Foundation has operating principles and processes that conform to the best standards of good governance.

All theft, fraud, misappropriation or corruption (active or passive) is considered unacceptable and will be subject to disciplinary measures in accordance with the laws in force in the country of intervention.

1. Whistle Blowing Procedure

In the event of any problem involving theft, fraud, misappropriation or corruption in a Tdh project or on the part of one of its partners, the person who has observed it will immediately inform his or her line manager in the field or the person responsible for finance on the ground.

This person will report the suspicion and/or allegation to the Country Representative.

All staff are informed about the anti-fraud and corruption policy.

If necessary, any member of staff can directly contact Tdh headquarters via an email address without having to go through his or her line manager or the Country Representative (see below).

No anonymous reporting can be dealt with.

The Program Director, the Zone and the Finance Director will decide whether to form a Crisis Management Committee on the basis of the seriousness of the incident and the need for monitoring.



The Crisis Management Committee will consist of :

- Program Director
- Finance Director
- Head of Communication and HR Director (on request)
- Risk Management Advisor

The General Director will be informed of any serious incidents.



2. Roles and responsibilities (in the field and at headquarters)

Country Representative:

- Will oversee the correct application of procedures relating to finance, audit and administration
- Will raise awareness among all Tdh staff of Tdh's attitude to theft, fraud, corruption and misappropriation
- Will inform headquarters of any incidents of theft, fraud, corruption or misappropriation
- Will write up incident reports and ensure that they are monitored

Finance Director:

- Will lay down procedures relating to finance, accounting, audit and administration
- Will supervise Zone Administrators
- Will monitor reports arising from the Whistle Blowing Policy and put forward the necessary measures

Financial Controler:

 Will oversee the implementation of procedures relating to finance and administration in the field

Program Manager:

- Will inform Finance and Operations managers of any incidents of theft, fraud, corruption or misappropriation
- Will be involved in recommending actions to be taken when incidents are reported in one of her or his Zone countries

Program Director:

 Will decide on the make-up of the Crisis Management Committee following recommendations from the Risk Management Advisor and the Program Managers

Risk Management Advisor:

- Is responsible for the dedicated fraud and corruption email address
- Will coordinate the Crisis Management Committee

3. Raising awareness and implementation in the field

All Tdh staff must be informed about Tdh's policy relating to theft, fraud, misappropriation and corruption.

All Tdh staff will be informed by the Country Representative of the Whistle Blowing procedure, including the email address for sending reports.

In the country, the Country Representative is the person with responsibility and decision-making power.