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**Aktion Amazonas**

# **Wistleblower Protocol**

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## 1.1. Introduction

It is important to Aktion Amazonas that any fraud, misconduct, or wrongdoing by Aktion Amazonas employees or volunteers are reported and properly dealt with.

We also encourage irregularities/corruption with project funding to be reported.

Unacceptable circumstances can be reported anonymously by emailing or contacting Aktion Amazonas' Management (Leadership Team) or the chairperson of the Board.

### **Contact information Management:**

Executive Director, Toke Nyborg, mail: [toke@aktionamazonas.org](mailto:toke@aktionamazonas.org)

Finance & Program Director, Nazaret Fernandez, mail: [nazare@aktionamazonas.org](mailto:nazare@aktionamazonas.org)

### **Contact information chairman of the Board:**

Anders Hesselund, mail: [anders@aktionamazonas.org](mailto:anders@aktionamazonas.org)

Reporting can also be done through a trusted colleague of the relevant person.

If the complaint concerns irregularities/corruption with project funding, you should contact the Danish project coordinator via email or WhatsApp. If you do not have information on the relevant project coordinator, the inquiry should be directed to Aktion Amazonas Finance & Program Directors via email: [nazaret@aktionamazonas.org](mailto:nazaret@aktionamazonas.org)

## **Complaints procedures**

Complaints are dealt with by a 'Complaints Group' consisting of Aktion Amazonas' Director, Finance & Program Director, and one Board representative appointed by the Board, totaling three individuals.

**For complaints concerning any of these persons, the Complaints Group is assembled without the accused person. He/She is replaced with a representative from the Board.**

The 'Complaints Group' ensures the registration of the case and assesses whether further actions are required.

## **Protection**

Aktion Amazonas provides protection for whistleblowers raising a legitimate concern about specified matters. These are called "qualifying disclosures".

A qualifying disclosure is one made in the public interest by a person who has a reasonable belief that one or more of the following acts has taken place:

- 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

It is not necessary for the individual to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. The whistleblower has no responsibility for

investigating the matter - it is the organisation's responsibility to ensure that an investigation takes place.

If the whistleblower is an employee and if he/she is not sure whether to raise a concern, they should discuss the issue with their line manager, the ED, or the Chairman.

## 1.2. Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. Employees 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 employee who raised the issue.
- No employee 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 employee will not be prejudiced because they have raised a legitimate concern.
- Victimization of an employee for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure the organisation's 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 manager, employees should not agree to remain silent. They should report the matter to a director/Board member.

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that their own contract has been, or is likely to be, broken, they should use the organisation's grievance procedure.

## 1.3. Complaint and feedback options for project beneficiaries

An integral part of AKAM's project implementation and international engagement is, at the start of the collaboration, informing the target group and other stakeholders, including the local partner, about complaint and feedback options, the possibility of anonymity, and AKAM's duty of confidentiality, as outlined in Aktion Amazonas' Whistleblower Protocol.

Similarly, Aktion Amazonas' local partners have whistleblower schemes that come into effect if the complaint concerns the local partner. For more information, please refer to the local partner's website.

Our complaints system is designed with the principle that target groups (beneficiaries) should, as a general rule, submit complaints through the local partner, including those concerning inappropriate behavior by Aktion Amazonas staff. Given that Aktion Amazonas conducts field monitoring and evaluations jointly with local partners, these partners are also empowered to submit complaints on behalf of the target group, if necessary. Furthermore, our complaints system is available in Spanish to ensure that all local stakeholders can file complaints directly with Aktion Amazonas regarding any inappropriate conduct. This also extends to local partners, who can submit complaints about Aktion Amazonas staff directly to Aktion Amazonas' complaints group, in accordance with the whistleblower protocol.

Our principle is that local complaints are handled locally, while complaints about Danish staff are managed through legal measures in Denmark. Therefore, Aktion Amazonas encourages local partners to have their own local whistleblower scheme in place.

All stakeholders involved in collaboration with Aktion Amazonas are encouraged to express any concerns or provide feedback regarding project implementation, cross-border behavior, collaboration challenges with Danish personnel, or behaviors inconsistent with Aktion Amazonas and the local partner's PSHEA and Anti-Corruption policies and Codes of Conduct.

Should a breach of the above guidelines and safeguards occur in an international context, complaints can be shared confidentially with an employee of Aktion Amazonas' local partner during field and project visits to communities, via WhatsApp, or directly with Aktion Amazonas through our webpage: <https://www.aktionamazonas.org/whistleblower-protocol>.

Community authorities are provided with contact information for members of the Executive Board of the local partner as part of project initiation. This enables community authorities to potentially submit complaints directly to partner management, including if the field officer or HQ staff of the local partner is the subject of the complaint.

In addition, Aktion Amazonas conducts ongoing supervision visits in connection with compliance monitoring and evaluation (M&E) and financial controlling. M&E visits always include meetings with the target group to document the implementation of the project's tangible goods and services through on-the-ground inspections and to gather feedback from the target group via face-to-face interviews.

We emphasize that feedback and complaints are initially made orally, as not everyone can read and write. In such cases, it is the local partner's responsibility to document the complaint and forward it to Aktion Amazonas. Additionally, Aktion Amazonas' website provides a WhatsApp number that can be used to send or record a complaint. The use of smartphones is quite widespread in the areas where Aktion Amazonas operates, and internet access is available even in smaller urban centers.

#### **1.4. Whistleblower protecting**

Protecting the identity of a whistle-blower is crucial and Aktion Amazonas make every effort to prevent retaliation.

There will be no sanctions against wrong information, if the report proves incorrect. However, Aktion Amazonas may impose various consequences against persons who are proven to have made false accusations, including disciplinary measures (warning/dismissal/exclusion) against own employees/volunteers, terminating of contracts with grant holders and suppliers, filing a police report in criminal matters or claiming compensation for damage suffered.

#### **1.5. Complaints procedure**

Unacceptable circumstances can be reported anonymously following the instructions on our website.

Reporting can also be done through a trusted colleague of the relevant person or by contacting Aktion Amazonas' Management (Leadership Team) or the chairperson of the Board.

Complaints are dealt with by a 'Complaints Group' consisting of Aktion Amazonas' Director, Finance and Program Director, and one Board representative appointed by the Board, totaling three individuals. For complaints concerning any of these persons, the Complaints Group is assembled without the accused person. He/She is replaced with a representative from the Board.

The 'Complaints Group' ensures the registration of the case and assesses whether further actions are required. If the case is rejected, it should be briefly explained to the complainant, provided the complainant's identity is known. The Board is informed about rejected cases.

If the case is assessed to require further action the 'Complaints Group' will then:

- Examine and investigate the facts of the case as well as provide the best possible decision-making basis for the inquiries and complaints received in respect of all parties involved.
- Ensure that a police report is or has been filed, if the complaint is deemed to be sufficiently serious to fall under the Danish Criminal Code.
- Prepare an informative note as a basis for deciding the case when the group considers it sufficiently clarified, and a recommendation of the possible outcome and sanctions.
- The secretariat management will assess the case and decide the sanctions to be imposed.
- If necessary, the secretariat management may decide to temporarily suspend the involved Aktion Amazonas employee(s) etc. while the case is being investigated. Similarly, the group may temporarily suspend cooperation with external partners, grant holders (including stop payments) and suppliers, while the case is being investigated.

The 'Complaints Group' will then:

- Monitor the process of the case and ensure the necessary follow-up after a decision has been made.
- Prepare a final report containing the outcome of the case.
- Ensure documentation of reports and complaints and anonymized statistics of all complaints. Complaints will be stored in the Management File on Aktion Amazonas intranet.
- Ensure correct storage of cases according to personal data protection law and sufficient anonymization of data for statistics and communication and ensure that all material in email correspondence with Board members and similar is erased at the relevant parties.

The resources applied for processing the report/complaint should be adapted to the nature and severity of the case.

Exemptions in case processing:

- If the report concerns irregularities/corruption with project funding the case will be transferred directly to processing according to Aktion Amazonas' administration guide and any guidelines from the Ministry of Foreign Affairs of Denmark/Rigsrevisionen - the Danish national audit office/the European Union and guidelines from any other donors.

Involvement of other parties in case processing:

- An employee representative (or a substitute) will always be involved as a dialogue partner in connection with reports/complaints concerning secretariat employees.

- When investigating the case, the 'Complaints Group' may request anyone at Aktion Amazonas to help provide information.
- In special cases, the group may contract with an external expert or similar to ensure the best possible decision-making basis.