



Whistleblowing policy – Follow This

Introduction (Purpose & Scope)

The purpose of this Whistleblowing Policy is to support and protect the integrity and ethical standards of our organization. It exists to provide a confidential and secure channel for employees, volunteers, and stakeholders to report any concerns or misconduct within the organization without fear of retaliation. Recognizing the importance of transparency, accountability, and maintaining a culture of honesty, this policy outlines the procedures for reporting unethical behaviour, ensuring that all concerns are handled promptly, thoroughly and sensitively.

This policy applies to all board members, employees, volunteers, and contractors of Follow This. It encompasses all forms of misconduct, including but not limited to fraud, corruption, harassment, and any actions that could harm the organization's reputation, financial wellbeing, or workplace safety.

Definitions:

Whistleblowing: The act of reporting suspected unethical conduct, wrongdoing, or risks within the organization that are contrary to the organization's values and could harm individuals, the public, or the organization itself.

Whistleblower: Someone who reports or discloses suspected wrongdoing to someone within their own organisation or to a competent authority.

Retaliation: Any form of reprisal, discrimination, or adverse action taken against a whistleblower because of their report.

Confidentiality: Ensuring that the identity of the whistleblower and the information provided are kept private and only disclosed to those necessary for the investigation.

Policy Statement & Principle

Follow This is committed to conducting its business with integrity, transparency, and in compliance with all applicable laws and regulations. It encourages a culture where employees and associates feel responsible for maintaining high ethical standards and empowered to report any concerns about misconduct without fear of retaliation. The organization assures that all reports will be treated confidentially and investigated thoroughly.

Code of Conduct

It is the responsibility of all board members, employees, and volunteers to report concerns about violations of law or regulations that govern the organization's operations, financial reporting, fraud, or unethical or illegal conduct.

No retaliation

Follow This prohibits retaliation against anyone who, in good faith, reports an ethical violation, or a suspected violation of law, such as complaints of discrimination, suspected fraud, or concerns regarding accounting or audit matters. Any retaliatory action against such individuals will result in disciplinary action, up to and including termination of employment.

Procedure

Roles and Responsibilities

- **Whistleblowers:** Responsible for reporting concerns in good faith and providing as much detail as possible to facilitate the investigation.
- **Huis voor Klokkenuiders (House for whistleblower):** An independent Dutch institution established to support and protect whistleblowers. They provide the following services: advice, investigation and protection. More information: [Home | Huisvoorklokkenuiders](#)
- **Confident (Rob Hulsman):** The confident acts as an alternative reporting channel. Staff members who prefer not to report directly to the team and/or Board Member, or “Huis voor Klokkenuiders” can submit their concerns to the confident. The confident will then, together with the whistleblower, decide on the next steps. The confident is committed to maintaining strict confidentiality; without the whistleblower's explicit consent, no details of the report will be disclosed both internally as externally, ensuring privacy.
- **Supervisory Board:** In case the Board Member has been notified, he will notify the board within 3 days of the report. They play a role in overseeing how these concerns are addressed and ensuring that appropriate actions are taken. If the confidential adviser is involved, it will depend on the agreements with the reporter whether the advisory board is informed.

Reporting pathway:

- **Reporting:** Whistleblowers have the option to report their concerns directly to the Board Member or to the confident. The whistleblower can also choose to seek assistance outside the organization, they can contact the "Huis voor Klokkenuiders," which offers support and guidance on the subsequent steps to be taken.
- **Notification and Investigation:** Upon receiving a report, either the Board Member or the confident will decide on the next steps together with the whistleblower. Next steps can include hiring an external partner to do research, scheduling a meeting with the supervisory board to get advice or to take direct action such as firing a colleague if deemed necessary.

Review

This policy will be reviewed annually and updated as required to ensure compliance with legislation and best practices.

Awareness policy

We will ensure that all staff and volunteers are aware of and understand this policy. This will be done in the following way: the policy will actively be shared with our current team by incorporating it in the onboarding package, and all new employees should read our policies before signing the contract. We will maintain a document where each colleague must indicate that they have read and accept all policies, including the whistleblowing policy.

The policy will be shared on our website (<https://www.follow-this.org/documents/>) and we will actively share this with current and new volunteers.