



Hilfe zur Selbsthilfe

Whistleblowing/ Complaints Policy

Purpose & Scope

Help – Hilfe zur Selbsthilfe (“Help”) is committed to high standards of ethical, moral, and legal business conduct. They form the base of our credibility towards donors, beneficiaries and stakeholders and underline the importance of our reputation as an international aid agency. Establishing sustainable strategies, processes and patterns in project implementation is part of our overall strategy. Help is further dedicated to acting in good faith with those employees who raise concerns regarding incorrect financial reporting, unlawful activity, non-compliance with rules and regulations such as the code of conduct, or otherwise improper conduct.

This Whistleblower Protection Policy aims to provide employees, stakeholders and partners with an avenue for raising such concerns, and to reassure such employees that they will be protected from reprisal or victimization as a consequence of reporting the alleged wrongdoing of any Help staffer or its partner organizations.

The policy applies to Help’s operations globally. It includes Help staff, volunteers, consultants as well as business partners, suppliers, service providers, beneficiaries, and the general public. The whistleblowing/ complaints policy refers to the reporting of violations of law, rules or regulations, harassment and the like. It is not meant for project specific day-to-day operations and employee discontent which should be raised within the line organization.

No Retaliation

No staffer, partner organization or other representative who in good faith reports a violation of a law, rules or regulation requirement shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Definition

A “violation” for the purposes of this policy may include but is not limited to fraud, corruption, criminal offenses, non-disclosure of a conflict of interest, abuse of power – including sexual exploitation, non-compliance with general rules and regulations (e.g. humanitarian principles, code of conduct) or any unlawful activity or improper conduct.

Certain reports of violations come under the German law called “Hinweisgeberschutzgesetz”, §2. This relates to suspected violations with regards to penal provisions and violations in certain areas that cause monetary fines (e.g. in the areas of health & safety, money laundering, product safety, procurement laws etc.). Those require a predetermined handling including specific deadlines and comprehensive protective measures from reprisal. Help will ensure compliance with these regulations.

Reporting Process

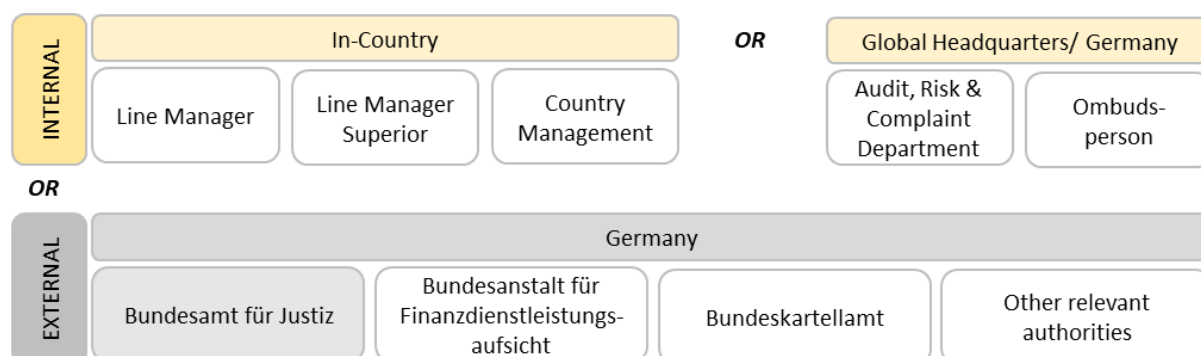
Violations or suspected violations with reference to the definition above can be reported **internally** (Help country management or global headquarters/ ombudsperson) or **externally** (external complaint registration authority in Germany).

- A. Help staff** should report any violations or concerns primarily to their **line manager**. If they do not feel comfortable speaking to their line manager for any legitimate reason or because they fear negative personal consequences for themselves such as reprisal, victimization, or dismissal, they may contact the **line manager’s direct superior or country management**. If Help staff do not feel comfortable or country management is subject of their concern, they should report to **Global Headquarters Audit, Risk- and Complaint Department** or the **ombudsperson**. Another option are external complaint registration authorities in Germany such as “Bundesamt für Justiz” or other relevant (case specific) authorities.

Note: It is mandatory for Help staff to report any suspected violations or non-compliance!

- B. Help partners, business partners, beneficiaries and all other stakeholders** should raise their concerns with local country management. If this seems inappropriate or not possible, they may raise the matter directly with **Help Global Headquarters Audit, Risk- and Complaint Department** or the appointed **Ombudsperson**. External complaint registration offices apply.

For an overview of Help-internal & external registration authorities please refer to the below:



Ways to report concerns or any violations internally to Global Headquarters or the Ombudsperson resp. to external authorities in Germany (ideally in English):

	Contact	Post	Mail	Phone
INTERNAL	Country Management and/or local Compliance Person			
	Global Headquarters Audit, Risk- and Complaint Management	Help - Hilfe zur Selbsthilfe c/o Audit, Risk- and Complaint Management > Confidential< Adenauerallee 131a 53113 Bonn Germany	internal_revision (at)help-ev.de	+49 228 91529 75 +49 173 3916476
	Ombudsperson	Help - Hilfe zur Selbsthilfe c/o Ombudsperson > Confidential< Adenauerallee 131a 53113 Bonn Germany	Ombudsperson (at)help-ev.de	
EXTERNAL	Bundesamt für Justiz	Bundesamt für Justiz Externe Meldestelle des Bundes 53094 Bonn Germany	Link to Online form	+49 228 99 410-6644

When reporting violations or concerns (ideally in English), complainants should use [this form](#) and make sure to:

- Include your contact details for further information gathering if needed.
- State the level of anonymity you prefer (*Note, that this may impact investigations if additional information is needed*).
- Include comprehensive details and any supporting evidence.
- State the affected area's/ person's full details.
- Explain why local country management cannot handle the issue.

Issue Handling

All reported violations will be taken seriously and investigated. The registration authority will:

- Confirm receipt of the reported violation to the complainant within 7 business days.
- Examine whether the reported violation falls under the definition of this policy and/ or under the "Hinweisgeberschutzgesetz, §2 specifically.
- Liaise with the complainant to obtain additional information to investigate and validate the matter.
- Conduct a thorough investigation, draw a conclusion and set up consequent actions.

- Provide feedback to the complainant within 3 months after the confirmation of the receipt of the violation case. The feedback will contain an overview of already executed as well as planned actions and their reasons, as far as applicable.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations and the identity of the complainant will be kept confidential to the extent possible, with the understanding that certain details may need to be shared with others in order to conduct an adequate investigation and to comply with applicable law.

Please note that anonymous reports and the lack of additional information gathering may impact the quality of investigations.

The policy has been approved in the above form by the Managing Director and the Secretary General.

Name, Function	Signature
Bianca Kaltschmitt Managing Director	
Dr. Thorsten Klose-Zuber Secretary General	