

Cultural Emergency Response (CER)

Whistleblowing Procedure

Cultural Emergency Response considers it important that anyone can report (suspected) abuses within the organisation adequately and safely. To ensure proper handling of these issues, this Whistleblower Policy is in place.

It ensures that anyone (e.g. employees, partners, vendors) can report (serious) abuses; it ensures that all reports are treated seriously and according to a thorough procedure, and it ensures that the person who justifiably brings up an issue does not suffer any negative consequences personally as a result of their report.

1. Definitions

For the purpose of this regulation, the following definitions apply:

- Party concerned: anyone who works for or with Cultural Emergency Response based on an agreement
- Board: members of the board of Cultural Emergency Response.
- Director: the person in charge of the day-to-day management of Cultural Emergency Response.
- Manager: the person who directly manages CER employees, in this case the manager and/or the director.
- Malpractice: a suspicion, based on reasonable grounds, relating to Cultural Emergency Response, whereby a social interest is at stake, in connection with:
 - an (imminent) criminal offence, such as theft, corruption and forgery;
 - an (imminent) violation of legislation and regulations;
 - an (imminent) danger to public health, safety or the environment;
 - a (threat of) deliberate misinformation of public bodies;
 - an (imminent) breach of the code of conduct of Cultural Emergency Response;
 - an improper or unwelcome conduct (physical or verbal) that might reasonably be expected or to be perceived to cause offence, humiliation or harm to another person
 - a (threat of) waste of public money;
 - a (threat of) deliberately withholding, destroying or manipulating information about these facts;

2. Reporting an Issue

The issue must be clearly described, with as much evidence as possible to support the claim. The party concerned may request the confidential adviser not to disclose their identity.

There are separate contact people, depending on whether the party concerned is a CER employee, or part of a 3rd party.

Internal Procedure

The party concerned should report the abuse internally directly to their manager. If they find reporting to their immediate superior undesirable, they may report to the director.

If the abuse is related to the director, the party concerned should report directly to CER’s externally appointed Confidential Counsellor (Vertrouwenspersoon) or the Board.

Director	Confidential Counsellor	Chairman of the Board
Sanne Letschert	Carolien Reinking	Bijan Rouhani
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External Procedure

In the instance the party concerned is external to CER (i.e. a partner, supplier) they are encouraged to contact the Director to report their experience.

If the abuse is related to the director, the party concerned should report directly to the Board.

Director

Sanne Letschert

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**Chairman of the Board**

Bijan Rouhani

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3. Next Steps

The person who has received a report will record this report in writing, stating the date of receiving it, have the party concerned sign this record for approval (who will receive a copy of it) and will immediately inform the director, or if the report concerns the director, the chairman of the board, of the reported suspicion of misconduct.

An investigation will then be initiated, during which the accused individual will be heard, as well as the party concerned.

The chairman of the board will decide whether an external party should be informed of the internal report of a suspicion of malpractice.

4. Standpoint

Within a period of six weeks from the moment of the internal report, the parties involved will be informed in writing by or on behalf of the chairman of the board of a substantive standpoint concerning the reported suspicion of an abuse. This will include all steps taken due to the complaint.

5. Legal protection

The party concerned who has reported an abuse in accordance with the provisions of these rules shall not be disadvantaged in their position because of the report.