



Whistleblowing

This is HRHF's policy and routine for whistleblowing to prevent fraud, corruption, abuse and unacceptable behaviour.

HRHF's whistleblowing policy

Human Rights House Foundation (HRHF) works to promote and protect the freedoms of expression, assembly and association, and the right to be a human rights defender. We protect, empower and support human rights defenders and their organisations. HRHF has a zero-tolerance policy towards fraud, corruption, abuse and unacceptable behaviour. We encourage our employees, partners, other organisations or persons to report any conduct in HRHF's operations they regard as unethical, illegal, a waste of resources, or in violation of professional standards.

What can be reported?

Censurable conditions can be unlawful or criminal behaviour, violations of internal rules or guidelines, or unethical or unacceptable behaviour.

Examples are:

- Bullying
- Harassment
- Unsolicited sexual attention
- Discrimination
- Fraud or financial disloyalty in service
- Corruption.
- Theft.

The whistleblowing mechanism should not be used to make false accusations, submit untrue information or to express dissatisfaction with a decision on wages, titles or job-descriptions in HRHF. Neither should it be used to express dissatisfaction with a decision on participation to HRHF's trainings.

How to report?

If you request to remain anonymous, we will respect your request, however it will be helpful in our investigation if you include your name and contact information. **The identity of whistleblowers will be kept confidential.**

Your report may be submitted orally or written, by person, post, phone call or email. If the report contains any special categories of personal data (such as personal data concerning racial or ethnic origin, health, sex life or sexual orientation), email shall only be used if the report is attached and encrypted with a password.

The report must describe your concern or your observation. Be as specific as possible about what you have seen, heard or experienced. It is helpful for our investigation if you provide information about:

- When and where you made the observation(s) or experience(s) causing the concern you are reporting.
- Other people that were present or have knowledge of the circumstance(s) you are reporting.

- Any knowledge of other similar cases.

If you realise that the information you've submitted to us is incomplete or incorrect, please submit the additional or correct information to us immediately.

The HRHF encourages whistleblowing and ensures that whistleblowers will not risk sanctions or reprisals.

HRHF's employees are encouraged to notify their supervisor or the "Health and safety representative", or if these are involved in the situation: The director. HRHF employees also have the right to notify supervisory authorities or other public authorities, such as the Norwegian Labour Inspection Authority of any unlawful conditions. Please see the whistleblowing procedures in the Employee Handbook paragraph 9.3. for more information.

Partners, other organisations or persons can submit their report anonymously here.

You can contact us via email at: birgitte.brekke@humanrightshouse.org

Letters should be addressed to:
Human Rights House Foundation
Head of Operations – confidential
Kirkegata 5
0153 Oslo

Telephone calls should be made to Human Rights House Foundation – ask to speak to Head of Operations:
+47 4648 8850

How do we follow up your report?

All reports submitted will be treated confidentially and given careful attention.

HRHF will assess the report as soon as possible, and properly investigate and handle it.

HRHF will notify the whistleblower within 10 working days after receiving a report, of what is being done. This however requires that we have been provided with your name and contact information.

HRHF will identify the affected individuals to determine their right of information, access and rectification. Restrictions to these rights may however apply in certain specific cases permitted by law.

If you want to correct or add information to a report you have submitted, please contact Head of Operations via e-mail or phone.

HRHF will if considered necessary, involve the law firm Wikborg & Rein in the investigation of a report.

Personal data

When handling a whistle blow it will be necessary to process personal data, both concerning the individual reporting(unless anonymous), any individuals reported, as well as other third parties involved, such as witnesses. HRHF will ensure that all personal data is being handled with the utmost confidentiality, and in accordance with HRHF's internal routines, including [HRHF's Privacy Policy](#) and applicable law, including the General Data Protection Regulation.

HRHF will not process more personal data than necessary, and not involve any other persons than those necessary in order to handle the whistle blow appropriately. Only the Head of Operations has access to the whistleblowers' reports in HRHF's files.

In the following circumstances, the information may however be transferred to a third party:

- Transfer to an external attorney or auditor in connection with the case processing of the report
- If the report results in a court case
- If the law so requires.

As a main rule all individuals involved, including the person(s) under investigation, shall be informed of the specific processing of personal data related to him/her. The right to be provided with information and of access is important for the purpose of ensuring this person's integrity and control with the personal data processed, and for the opportunity to counter any accusations. However, it is possible that informing the accused person at an early stage may jeopardise the investigation. In these cases, and when permitted by law, the sharing of specific information with the accused might need to be deferred.

Registered data is only stored in HRHF's files as long as it is needed and will then be deleted.