

WHISTLE-BLOWER POLICY

Introduction

Clowns Without Borders have a whistle-blower policy in place to uphold the organization's professionalism, ethical standards, integrity, and the high quality of work carried out in Sweden and internationally. Clowns Without Borders aim to be a transparent and open organization where everyone can participate and feel involved. We also strive to protect our employees, volunteers, and the people we work with.

Clowns Without Borders have a specific Child Protection Policy to ensure that children's rights, safety, and perspectives are respected and safeguarded in all areas of our work.

The purpose of this policy is to ensure that suspected irregularities, unethical conduct, or breaches of laws or internal guidelines can be reported in a safe and confidential manner. The policy aims to protect the whistle-blower from retaliation and to ensure a legally secure and fair handling of reported cases.

Confidentiality and protection of the whistle-blower

- Everyone has the right to report an irregularity anonymously.
- The organization must ensure that no individual is identified or exposed as a whistle-blower.
- No person who reports an irregularity in good faith shall be subject to negative consequences, discrimination, or retaliation.
- Harassment, exposure, or any other form of negative treatment of a whistle-blower is not tolerated.
- A whistle-blower who knowingly provides false information with the intention of harming an individual or Clowns Without Borders may be excluded from the organization.

Reporting

This policy aims to safeguard the anonymity and well-being of individuals reporting serious irregularities concerning:

- Financial matters
- Illegal activities
- Mismanagement of an assignment or position of trust
- Activities or behavior that contravene the organization's by-laws or policies

Minor issues, conflicts, or misunderstandings in everyday work situations are handled through ordinary staff procedures.

Reporting procedure

Reporting shall take place in the following order:

- Primarily to the Secretary General (contact details are available on the organization's website).

Laughter and hope for vulnerable children today, contributes to peace tomorrow.

- If the report concerns the Secretary General, or if the whistle-blower does not have confidence in the Secretary General, reporting shall instead be made to the Chairperson or any member of the Board.

Reports may be submitted by email, letter, or oral communication. A report should include, where possible:

- A description of what has occurred
- Timeframe(s) and any individuals involved
- Any supporting documentation or evidence (if available)

Process and handling of reports

Once a whistle-blower report has been received, the following process applies:

Acknowledgement

The whistle-blower will receive confirmation that the report has been received within one week.

Initial assessment

The Secretary General (or the contacted Board representative) makes an initial assessment of the seriousness and relevance of the report.

Investigation

- An investigation is initiated if the report is deemed to have merit.
- Investigations may be conducted internally or with the support of an external party when necessary.
- All information is handled under strict confidentiality.

Measures and decisions

- The Secretary General / Chairperson / Board member informs the full Board.
- Decisions on measures are taken based on the outcome of the investigation.
- In serious cases, the full Board is involved in the decision-making process.

Feedback

The whistle-blower is informed that the matter has been investigated and, to the extent permitted by confidentiality, of any actions taken.

Roles and responsibilities

The Board

Establishes and updates the policy and makes decisions in serious cases.

Chairperson / contacted Board member

Receives reports concerning the Secretary General and ensures proper handling of such cases.

Adopted by the Board 16/02/2026

Secretary General

Responsible for receiving and handling reports, conducting investigations, and reporting to the Board.

All employees and members

Have a responsibility to report suspected irregularities and to respect the whistleblower's anonymity.

Documentation and follow-up

All whistle-blower cases shall be documented in a secure and confidential manner. Only authorized individuals may access the information. The organization follows up on the handling of cases annually to ensure transparency and trust.

Responsibility

The Board of Clowns Without Borders is responsible for establishing and updating the policies required by the organization. The Board assigns the Secretary General to ensure the implementation of these policies in the organization's daily work by developing guidelines and procedures.

The policy is revised at least every two years and adopted by the Board.