

WHISTLEBLOWING POLICY

Last Updated: June 2025

Next Update: June 2026

Introduction

Street Child always strives to safeguard and act in the interest of the vulnerable populations it serves, the public and its trustees, employees, contractors and volunteers in line with its organisational Whistleblowing Policy. All staff, trustees, contractors and volunteers (personnel) are required to bring to the attention of Street Child any practices or actions of Street Child, its employees, partners or other agents, including counterparts in partner governments, which they reasonably believe are against the public interest in that the practice or action is:

- a criminal offence;
- an act of corruption and/or fraud;
- a failure to comply with any legal obligation;
- a miscarriage of justice;
- a danger to the health and safety of any individual;
- a safeguarding or child protection violation;
- a health and safety violation;
- an environmental breach;
- a discrimination or harassment that leadership is ignoring;
- a threat to the operation or reputation of Street Child;
- or an attempt to conceal information on any of the above.

Purpose of the Whistleblowing Policy

A whistleblowing policy plays a unique and critical role in an organization, even when other policies are in place. Other policies (like HR policies, grievance procedures, or compliance manuals) often deal with **routine issues** (e.g., employee disputes, performance, benefits). A whistleblowing policy is an additional platform which specifically encourages reporting of the actions, mentioned in the section above. Street Child Whistleblowing Policy:

- Allows **anonymous or confidential** reporting
- Protects whistleblowers from **retaliation** (e.g., demotion, dismissal, harassment)
- Encourages people to speak up **without fear**, which general policies may not address
- Targets **serious ethical or legal concerns**
- Provides a **protected and dedicated channel**

To whom Should Concern be Reported

For actual or alleged incidents or concerns including but not limited to financial, criminal, health and safety, legal or conflict of interest, personnel should raise this either:

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- Anonymously or with identity, through the complaint box located in each country office. Boxes are checked regularly and referred as appropriate;
- With a member of the Global Whistleblowing Contacts as listed in Appendix 1 or;
- Via their Country Lead as listed in Appendix 1.
- Anonymously by filling out a whistleblowing form on SC website:
<https://www.street-child.org/whistleblowing-policy/>

Since safeguarding has a different set of channels, for actual or alleged incidents or concerns related to safeguarding, personnel should initially raise their concern either:

- Anonymously or with identity through the complaints box located in each country office. Boxes are checked regularly and referred as appropriate;
- With their Line Manager or Safeguarding Focal Point as listed in Appendix 1
- With any member of the Global Safeguarding Contacts as listed in Appendix 1 or;
- By sending email to safeguarding@street-child.org

Where personnel are dissatisfied with a response, they should raise the matter in writing directly with the CEO or, if necessary, the Chair of the Board of Trustees.

Street Child takes seriously the prospect of any potential incident, and all Street Child personnel are obliged to report. Any failure on the part of any Street Child personnel to report any incidents they witness or are aware of may result in disciplinary procedures.

Principles of Whistleblowing Management

For the protection of its personnel, affiliates and organisational reputation, Street Child also takes very seriously any involvement of malicious or false allegations or public circulation of unfounded allegations. Any personnel who are found to have been involved may be subject to disciplinary procedures.

Street Child will also endeavor to ensure that personnel and affiliates are protected from any intimidation or harassment by any other parties. Specifically, any trustee, employee, contractor or volunteer raising such concerns in good faith will not be subject to any detriment either during or after his or her employment/contract/volunteer agreement.

All concerns will be treated in confidence and every effort will be made not to reveal the identity of the whistleblower, if that is the wish of the complainant. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the personnel's disclosure without their help, so the whistleblower may be asked to come forward as a witness. If they agree to this, they will be offered advice and support. However, an anonymously made complaint will be given equal importance and will still be processed and investigated in due time. All the complaints/concerns will be processed through a procedure defined in annexure 3.

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Glossary of Terms

Affiliates

This includes the staff, board members, volunteers, interns, consultants, pro bono experts and private contractors of organisations who have entered into partnership, sub-grant or sub-recipient agreements with Street Child.

Harassment

Harassment covers a wide range of behaviours of an offensive nature. It is understood as behaviour that demeans, humiliates, and intimidates a person. These are behaviours that appear to be disturbing, upsetting, or threatening. When harassing behaviours become repetitive, it is defined as bullying. The continuity or repetitiveness distress caused may distinguish it from insult.

Harm

Psychological, physical, emotional, sexual infringement of an individual's rights. Harm by neglect includes the withholding of available resource or assistance. Self-harm is when you hurt yourself as a way of dealing with very difficult feelings, painful memories or overwhelming situations and experiences. Potential self-harm may also include suicide attempt, or radicalisation.

Investigation

The action of investigating something or someone; formal or systematic examination or research.

Serious Incident

It is defined as an incident which has caused significant harm to an individual affiliated with the organization and/or constitutes a major threat to the operations and reputation of the organization. This would include safeguarding concerns of sexual abuse, exploitation, serious physical or emotional abuse and death.

Sexual Exploitation and Abuse - as defined by the UN Secretary General Bulletin ST/SGB/2003/13:

“Sexual exploitation” means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Similarly, the term “sexual abuse” means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.¹

Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense. A child who is being abused may experience more than one type of abuse.

¹

<https://undocs.org/Home/Mobile?FinalSymbol=ST%2FSGSB%2F2003%2F13&Language=E&DeviceType=Desktop&LangRequested=False>

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Sexual Harassment

Sexual harassment is a type of harassment based on the sex or gender of a victim. It can involve offensive, sexist or sexual behaviour, verbal or physical actions. Harassment may be explicit or implicit.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

Vulnerable Population

This can refer to all children in educational settings, family homes or community settings, street children, reintegrated and reunified children, and all trainees in the vocational/skills training centres, including those in residential centres or institutional centres, detention centres, children with health issues, displaced and refugee children. This also includes adults enrolled in any of Street Child programmes in the community or home settings or any other set up and who are at risk of harm and abuse of any form.

Related Policies

- Street Child Safeguarding Policy and Procedure
- Street Child Child Protection Policy
- Street Child IT policy
- Street Child Data Protection Policy
- Street Child Equality Diversity and Inclusion Policy
- Street Child Social Media Policy
- Street Child HR Manual
- Street Child Code of Conduct

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Appendix 1 – Contact List

Whistleblowing Complaints Committee

Board of Trustees Representative – Anthony Wallersteiner

E: awallersteiner@stowe.co.uk T: +44 (0)1280 818240

CEO – Tom Dannatt

E: tom@street-child.org T: +44 7782 173447

Executive Director AET Programmes – Julie Polzerova

E: Julie.polzerova@street-child.org T: +447535349787

Finance Director – Sarah Noak

E: sarah.noak@street-child.org T: +44 7970 820 195

Global Whistleblowing Contacts

Anyone may contact any of these individuals regarding a whistleblowing incident

Board of Trustees Representative – Anthony Wallersteiner

E: awallersteiner@stowe.co.uk T: +44 (0)1280 818240

CEO – Tom Dannatt

E: tom@street-child.org T: +44 7782 173447

Designated Safeguarding Trustee – Lynn Davies

E: L.DAVIES@bham.ac.uk T: +44 (0)7798 650487

Global Safeguarding Focal Point – Julie Polzerova

E: julie.polzerova@street-child.org T: +44(0) 7535349787

Global Safeguarding Specialist – Sadia Hussain

E: sadia.hussain@street-child.org T: +92 3007043982

Country Leads

Afghanistan Safeguarding Focal Point – Tajammul Hussain

E: tajammul.hussain@street-child.org T: +93 728529412

Bangladesh Safeguarding Focal Point – Kristina Hiya Baroi

E: kristina.baroi@street-child.org T: +1624628794

Burundi Safeguarding Focal Point – Denis Ndayizeye

denis.ndayizeye@street-child.org T: WhatsApp: +257 79 320 312/+ 257 61 320 312

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Cameroon Safeguarding Focal Point – Kingsley Udo
E: Kingsley.udo@street-child.org T: +237 651235268

DRC Safeguarding Focal Point-Ravaka Ranivoarianja
E: ravaka.ranivoarianja@street-child.org T: +243820628101.

Kenya Safeguarding Focal Point Rosebella Odhiambo
E: admin@africaeducationaltrust.org T: +254 723903191

Sierra Leone and Liberia Safeguarding Focal Point – Emily Tunnacliffe
E: emily.tunnacliffe@street-child.org T: +44 7768 882891

Mozambique Safeguarding Focal Point - Benigna Matabele
E: benigna.matabele@street-child.org T: +258 877399002

Nepal Safeguarding Focal Point – Nilam Subedi
E: nilam.subedi@street-child.org T: +9779846049472

Nigeria Safeguarding Focal Point – Elam Firrichi
E: firrichi.elam@street-child.org T: +234 9033828835

Moldova - vacant

Pakistan Safeguarding Focal Point – Sadia Hussain
E: sadia.hussain@street-child.org T: +923 007043982

Somalia and Somali Land Safeguarding Focal Point – Mohamed Iidle
E: m.iidle@street-child.org T: +252 61 2500005

South Sudan Safeguarding Focal Point – Name: Esther Oliga
E: e.oliga@africaeducationaltrust.org T: +211922221420

Uganda Safeguarding Focal Point – Susan Nyangoma
E: susan.nyangoma@street-child.org T: +256 773 375593

UK Safeguarding Focal Point – Susana Munisi
E: susana.munisi@street-child.org T: +44 (0) 7976 298001

EU Safeguarding Focal Point – Clothilde Bruneton
E: clothilde.bruneton@street-child.org T: +33 6 42 89 38 84

Ukraine Safeguarding Focal Point – Oleksandr GOLINEVYCH
E: Oleksandr.golinevych@street-child.org T: +380 99 689-5231

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Appendix 2 – Incident Report Form



Incident Report Form

Date:

Name of person filing report (optional):

Type of report:

- ☐ Corruption, fraud or bribery
- ☐ Other criminal act(s)
- ☐ Security incident or near-miss
- ☐ Health and Safety
- ☐ Any other practice that has the potential to bring the organisation into disrepute
- ☐ Other - specify:

Safeguarding

- ☐ Bullying, harassment or abuse
- ☐ Child protection
- ☐ Sexual harassment, abuse or exploitation

When was the incident (date, time):

Where exactly was the incident:

Who was involved:

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What happened:

What action was taken:

What action still needs to be taken:

Copy of report to: [insert name]

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Comment on action taken [TO BE FILLED OUT BY MANAGER ONLY]

Appendix 3 – Investigation Procedures: timeline summary

Step	Action	Within
1. Incident occurs - protect	If the incident relates to a serious safeguarding incident and/or a threat to an individual's life and/or presents a serious reputational risk, take immediate action to protect the victim. Note: For a detailed safeguarding complaint procedure, see safeguarding complaint response procedure as outlined in Street Child Safeguarding Policy. For any other incident, proceed straight to step 2.	Instantly
2. Incident occurs - report	For all incidents except safeguarding (including but not limited to financial, criminal, conflict of interest, legal, health and safety), make a report anonymously via a complaints box, our website, with a member of the Global Whistleblowing Contacts or with your Country Lead. The individual who received the report should acknowledge receipt of the concern by email to the staff member within 3 working days.	Within 24 hours, where logistically possible

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	Reports can be made by sending a completed Incident Report Form (Appendix 2) to the phone or email contact details listed in Appendix 1. Anonymous or disclosed reports can be placed in the complaints box located in each country office.	
3. Incident is assessed by the Country Whistleblowing FP, Global Whistleblowing/ Safeguarding Contact or Country Head if required for sensitive/serious issues.	All incidents except safeguarding: Refer to the Whistleblowing Focal Point or Whistleblowing Complaints Committee (WCC) if there is one at the country level. The committee decides if the complaint is escalated to the Global Whistleblowing Committee or to be investigated at the country level in case of an alleged or actual whistleblowing incident.	Instantly, in the case of a serious incident (threat to life, serious reputational risk) Or Within 48 hours of the receipt of the concern/complaint to allow further investigation
4. Incident is reported to donor	The Country Office and the Headquarter are responsible for reporting suspected incident to donors after discussing and agreeing on the details.	Within 24 hours of the incident being received or determined by HQ and Country Office's donor reporting obligations (no verification required at this stage)
5. After the assessment of the Whistleblowing Focal Point or Whistleblowing Complaints Committee-action plan	Agree on decision making and next steps for investigation.	Instantly, in the case of a serious incident (threat to life, serious reputational risk) Or Within 24 hours of assessment by the Country Whistleblowing FP/ Whistleblowing Complaints Committee

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6. Incident is investigated by the whistleblowing committee, in collaboration with relevant authorities	For all incidents except safeguarding: Decision maker/s (and where necessary WCC) carry out next steps including: - Survivor support - Investigation - Disciplinary action (if the relevant committee recommends disciplinary action regarding staff/volunteer then this is referred to a disciplinary committee to take forward in accordance with the HR manual.) - Reporting to relevant authorities	Within 2 weeks where possible
7. Close the case	All follow up investigations are completed All affected parties are informed of the outcome All statutory and governance reporting requirements are fulfilled Whistleblowing FP/Committee shall provide a final update to the staff member who reported the whistleblowing concern confirming: 1. What steps were taken to investigate the reported whistleblowing concern; 2. What the investigation found; and 3. Steps taken or to be taken following the findings of the investigation. IF NO WRONGDOING IS FOUND	Within 3 months or 90 days from the receipt of the complaint or of the incident being reported.

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	If an investigation concludes that no wrongdoing has occurred, or where the staff member making the disclosure is mistaken or unaware of all relevant facts, the Whistleblowing FP/Whistleblowing Committee will inform the reporting staff member within five (5) days of completion of the investigation that their concern was unsubstantiated.	
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