

# Whistle Blower Policy

**FSD (Fondation suisse de déminage)**  
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## I. INTRODUCTION

FSD as an international humanitarian NGO is committed to operating in furtherance of its purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers. This policy outlines a procedure for employees to report actions that an employee reasonably believes violates a law, or regulation or that constitutes fraudulent accounting or other practices.

## II. KEY TERMS

**Associated personnel:** A person that is engaged with work or visits related to FSD, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians.

**Beneficiaries:** under this policy, this term refers to any person who benefits, directly or indirectly from FSD's programmes.

**Code of Conduct:** A set of standards of behaviour that staff of an organisation are obliged to adhere to.

**Corruptive behaviour:** the misuse by any nation or international staff of entrusted power for private gain or advantage. The unrightfully private advantage gained by the corruptive behavior can be both financial (e.g. a commission, a cash bribe, a kick-back etc.) or nonfinancial (e.g. abuse of services of a subordinate, a career advantage, sexual abuse etc.).

**Sexual abuse:** the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

## III. POLICY STATEMENT

Fondation suisse de déminage (FSD) is a private, independent, non-profit international mine action organisation, dedicated to reducing the threat of mines and Explosive Remnants of War (ERW) and the risks posed by environmental hazards worldwide. As an international NGO, FSD holds a profound dedication to ensuring the safety, well-being, and rights of every beneficiary.

FSD will make sure the do no harm, transparency and effectiveness of its interventions.

## IV. POLICY SCOPE

The principles set forth in this policy apply in all FSD workplaces and for all FSD activities.

This policy applies to, and is mandatory for, FSD's policy adherents who are defined as all FSD Board members, management staff, international and national staff, (full and part-time) in all FSD structures and programmes.

The policy scope also covers volunteers, interns, consultants, contractors, all persons acting voluntarily on behalf of FSD, any current or potential suppliers of any sort of goods, services, or works, and all other people not included in the above-mentioned categories who have signed a contract with FSD.

FSD includes all components of the FSD Group: Fondation Suisse de Déminage (FSD) in Geneva, Switzerland; Crosstech S.A., a Geneva-based commercial subsidiary of FSD as well as the Association FSD France, based in Archamps, France. This also extends to any representative office of FSD in its global programmes and all locally registered FSD branch, charity or legal organisation bearing the FSD name.

FSD's partner organisations and suppliers are expected to have similar commitments that meet minimum standards.

This Policy should be read in conjunction with the following related FSD policies:

- Code of Conduct
- Code of Ethics
- Child Safeguarding Policy
- Prevention of Sexual Exploitation and Abuse (PSEA)

## V. POLICY IMPLEMENTATION

Specific high-level direction is given for all staff, who must comply with these principles and develop local policies where required.

## VI. CORE PRINCIPLES

FSD acknowledges the importance of the following principles:

- **Humanity**, meaning the focus on saving human lives and alleviating suffering wherever it is found.
- **Impartiality**, meaning the implementation of actions solely on the basis of need, without discrimination between or within affected populations.
- **Neutrality**, meaning that FSD operations must not favour any side in an armed conflict or other dispute where such action is carried out.
- **Independence**, meaning the autonomy of humanitarian objectives from the political, economic, military or other objectives that any actor may hold with regard to areas where humanitarian action is being implemented.

## VII. POLICY COMMITMENTS

Corruptive behaviour is not only morally unacceptable, but it threatens one of several of these principles and therefore the trustworthiness, reputation and image of FSD.

Therefore, in this section, the policy will detail specific commitments for FSD staff to implement, based on the core principles.

### 1. Awareness

FSD is committed to:

- Include this policy in the induction training that is mandatory for the newly-hired local and international staff
- Conduct a training for this policy at least once a year in each programme.
- Post this policy on the bulletin board of all FSD offices in English and local language.
- Include this policy in all basic and refresher training courses for all international and national staff.

### 2. Prevention

FSD is determined to prevent corruptive behaviour by the following set of rules and processes:

- Tight financial controls, comprehensive financial tracking, monitoring and reporting systems
- Application of the principle of double signatures on all accounting documents
- Systematic internal audit of all accounting entries and relevant documents
- Application of the national and international procurement procedures
- Establishment of beneficiary lists with transparent criteria
- Encouragement of donor monitoring
- Definition, declaration and application of clear employment criteria and recruitment procedures
- Generic e-mail system
- Sensitization and regular refresher training of all managers and staff
- Zero tolerance for those who commit sexual exploitation and abuse.

### 3. Enabling reports

FSD managers, staff and associated personnel are obliged to report any concerns or suspicions regarding corruptive behaviours by FSD staff members or associated personnel.

FSD will ensure that safe, appropriate, accessible means of reporting are made available to staff, associated personnel and the communities we work with.

FSD will ensure that persons reporting (in good faith) corruption concerns to FSD, are entitled to protection against any retaliatory action taken against them by FSD staff. All allegations of retaliation will be investigated and, if substantiated, shall be considered serious misconduct. FSD will also accept complaints from any external source such as members of the public, partners and official bodies.

#### 4. How to report

If despite all these principles and control mechanism, abusive and corrupt behavior of a staff or manager is noted, FSD encourages all staff to declare such observations. In order to protect the observing reporter and assure the suspected staff or manager of strict, objective and professional analysis and treatment of the allegation, the following procedure is to be followed.

FSD has named as ombudsman for such allegations its board member, Dr. Nawal Aït-Hocine. Allegations should be transmitted by e-mail to [transparency@fsd.ch](mailto:transparency@fsd.ch), or by letter to the following postal address:

Dr. Nawal Aït-Hocine  
38 Route de Malagnou  
1208 Geneva Switzerland

For urgent cases, she can also be reached by telephone under the following number: +41 79 679 45 72.

Allegations should be precise and detailed, include the name and function of the alleged offender, description of circumstances, events and timing and include copies of relevant documents if available. The allegation must be signed by the reporter. Anonymous declarations will not be dealt with.

#### 5. Response

FSD will follow up on all submitted claims. If the claims appear to be serious and substantiated, Dr. Aït-Hocine will open a full investigation of the case, based on all available reports and documents, and by involving managers and staff at all hierarchical levels if necessary. In severe cases, Dr. Aït-Hocine will personally visit the concerned project and complete her inquiry by personal analysis and audit of the situation. Dr. Aït-Hocine will throughout the whole procedure guarantee full confidentiality about the identity of the reporter and neither reveal his/ her name during the investigation nor in the final report.

Dr. Aït-Hocine will conclude her inquiry by drafting a comprehensive report about the case and deliver it to the Director General, who will then decide on how to correct the situation and sanction the offender - or close the file in case the findings have been unsubstantial. In case proven guilty of corruptive behaviour (inclusive of sexual exploitation and abuse), immediate termination of contract as well as ban on any contract or dealings with FSD.

## References

FSD Internal and external audit policy

FSD financial procedures

FSD procurement procedures

FSD rules & regulations