



## Whistleblowing Policy

Distribute Aid requires directors, coordinators, and other volunteers to observe high standards of organisational and personal ethics in the conduct of their duties and responsibilities. As representatives of Distribute Aid, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws, regulations, and internal ethical policies. Doing this helps us be as effective as possible at pursuing our mission!

This Whistleblower Policy is intended to encourage and enable individuals to raise serious concerns without retribution so that Distribute Aid can address and correct inappropriate conduct and actions. It is the responsibility of all board members, directors, coordinators, and volunteers to report concerns about violations of [Distribute Aid's code of conduct](#) or suspected violations of law or regulations that govern Distribute Aid's operations. Such violations could include using racist, sexist, ableist, or otherwise derogatory and discriminatory language, or graver violations such as putting the safety of people on the move at risk by willfully exposing locations or publicising photographs with sensitive information.

It is the policy of Distribute Aid that a Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith. Anyone who retaliates against the Whistleblower (who reported an event in good faith) at any point in the process described below will be subject to discipline.

The following outlines the procedure for anyone to raise concerns about the conduct of any member of Distribute Aid or practice carried out by the organisation.



## Internal Reporting Procedure for Individuals with a Concern is as Such:

1. The Whistleblower begins the process when they have good faith, reasonable grounds for believing that a violation has occurred.
  - a. If the person is not acting in good faith and offers unsubstantiated allegations made maliciously or knowingly to be false, this can be viewed as a disciplinary offence.
2. Assuming they are acting in good faith, the Whistleblower should first decide if they wish for their report to be anonymous or not.
  - a. If they do not wish to report anonymously, they may use any written medium (email, document, etc.) to file the report with the proper individual, per step 3.
  - b. If they do wish to report anonymously, they should create an account on ProtonMail\* with an anonymous address, such as a random sequence of numerals. See **Appendix B** of this document for instructions on how to set up a Proton Mail Account to *File* a Report.\*\*
3. The Whistleblower should promptly report the suspected or actual event to the relevant coordinator. Which coordinator is most “relevant” will always be a judgement call; for this policy, it suffices to say that when the issue is related to a logistics matter, the Operations Lead is the most relevant, and if the issue is related to an administrative or team matter, the European Director is most relevant. If the issue is related to the Operations Lead or European Director, the Executive Director is most relevant. Please see **Appendix A** of this document for contact information for relevant parties. The coordinators of the organisation are as follows:
  - a. Operations Lead: J. Taylor Fairbank.
  - b. European Director: Nicole Tingle.
  - c. Executive Director: Sara Longard.

\*ProtonMail is an anonymous, end-to-end encrypted, Swiss-based email service that does not require personal information and does not log IP addresses. It has a reputation for true anonymity and security. Setting up an account can be done quickly and easily.

\*\*The Whistleblower should take care to record their login details for ProtonMail so that they can log back in and see when a response comes in, since DA will not be able to see or reset their password.



4. If the Whistleblower is uncomfortable or otherwise reluctant to report to the relevant coordinator (for example, if said coordinator is the source of the concern), then the Whistleblower may report the event to the next highest level of management, which is the Executive Director (see **Appendix A** of this document for contact information). If the Whistleblower is uncomfortable or otherwise reluctant to report to the relevant coordinator and the Executive Director, then the Whistleblower may report the event to an appropriate board member (see **Appendix A** of this document for contact information). For financial concerns the Whistleblower may contact the Auditor (see **Appendix A** of this document for contact information).
5. It is the responsibility of the person who receives a report to promptly investigate and/or resolve the issue.
  - a. Throughout this investigation and the entire process, the identity of the Whistleblower, if known, shall remain confidential to all persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organisation may be required to disclose this information to law enforcement.
6. The investigating individual shall send a report to the Whistleblower within seven days of the initial report, regarding the investigation, disposition, or resolution of the issue. This report must be in writing.
  - a. If the initial report was not filed anonymously, then the investigative report may be issued by email or print to the Whistleblower.
  - b. If the initial report was filed anonymously, then the investigative report must be sent via ProtonMail to the same address that the initial report came from.
7. If the Whistleblower is not satisfied with the report from the internal investigator, then they have the right to report the event to the next highest level of authority within the organisation for another 7-day investigation or to the appropriate legal or investigative agency. If the Whistleblower chooses to report internally, then the process returns to step 2.
  - a. For example, if someone is unsatisfied with the Operations Leads' resolution, they could file a second report with the Executive Director.



## Reporting to Authorities

At any point during the process, a Whistleblower may choose to file a report with the appropriate legal or investigative agency, outside of Distribute Aid. Crimes against persons or property, such as assault, burglary, etc., should immediately be reported to local law enforcement personnel. Sweden does not have a dedicated agency for overseeing non-profit organisations.

The following agencies may be helpful depending on the nature of the issue:

- Swedish Tax Agency, <https://www.skatteverket.se/>, +46 0771 567 567.
- Swedish Consumer Agency report form, <https://www.konsumentverket.se/languages/english-engelska/this-is-how-you-file-a-complaint/>, [konsumentverket@konsumentverket.se](mailto:konsumentverket@konsumentverket.se)
- Swedish Police report form, <https://polisen.se/en/victims-of-crime/making-a-report/>, 0046 77 114 14 00.



## Appendix A: Contact Information for Relevant Parties

### Coordinators

#### **Operations Lead**

Taylor Fairbank

Email: [taylor@distributedaid.org](mailto:taylor@distributedaid.org)

ProtonMail: taylordistributedaid@proton.me

#### **European Director**

Nicole Tingle

Email: [nicole@distributedaid.org](mailto:nicole@distributedaid.org)

ProtonMail: NicoleDistributeAid@proton.me

### Director

#### **Sara Lönegård**

Email: [sara@distributedaid.org](mailto:sara@distributedaid.org)

ProtonMail: saradistributedaid@proton.me

### Board Members

#### **Rudayna Abdo**

Email: [rudayna@thaki.org](mailto:rudayna@thaki.org)

ProtonMail:

rudaynadistributedaid@proton.me

#### **Sara Lönegård**

Email: [sara@distributedaid.org](mailto:sara@distributedaid.org)

ProtonMail: saradistributedaid@proton.me

#### **Stephanie Fairbank**

Email: [sa.fairbank@gmail.com](mailto:sa.fairbank@gmail.com)

ProtonMail:

stephaniedistributedaid@proton.me



## Appendix B: Instructions for Setting Up Proton Mail Account to *File a Report*

1. Go to <https://protonmail.com/>.
2. Select “Sign Up” in the top right.
3. Select the “Free” option and then click “Select Free Account.”
4. Select a username that is not personally identifiable, like a meaningless string of numerals. Select a password, and record it somewhere so that you can access your account later.
5. You may choose to add a recovery method. If you do not do this and lose your password, then you will be unable to log into your account later to check on the status of your report and receive your 7 day investigative report. If you do choose to add a recovery method, this information will not be visible to Distribute Aid at any point during the reporting process.
  - a. If you do not wish to add a recovery method, click “Skip”.
6. Select the free plan once again.
7. Verify that you are a human via Captcha or one of the other options.
8. You should be redirected to an email inbox. You can now compose a message.

Note: Take care to record your login details for ProtonMail so that you can log back in and see when a response comes in, since DA will not be able to see or reset your password.



## Appendix C: Instructions for Setting Up Proton Mail Account to *Receive Reports*

1. Go to <https://protonmail.com/>.
2. Select "Sign Up" in the top right.
3. Select the "Free" option and then click "Select Free Account."
4. Select a username that is personally identifiable. Select a password, and record it somewhere so that you can access your account later.
5. Add a recovery email to ensure that you can log into your account even if you lose your password. Use your DA email address, if you have one. You may add a recovery phone number too if you wish, but make sure to add a recovery email address so you can set up forwarding.
6. Select the free plan once again.
7. Verify that you are a human via Captcha or one of the other options.
8. Once you have created your account and logged in, select the gear icon at the top right of the screen. Click "go to settings."
9. Select "Password and Recovery" on the left menu bar.
10. Under "Recovery & notification," set "Daily email notifications" to the "on" position.
11. Your recovery email address will now receive an email whenever someone sends you a message on ProtonMail, so you do not need to check ProtonMail unless you receive one of these emails. Note, ProtonMail sends you an update no more than once per day, so the email notifications may not be instantaneous if you receive more than one ProtonMail in a 24 hour period.