



Whistleblower Protection Policy

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1. Purpose, scope and audience

- 1.1 The Federation has a zero tolerance policy to any form of retaliation against a person who either reports reasonably held suspicions of a breach of the Federation’s Internal Rules or who cooperates in an audit or investigation process carried out under the authority of the Secretary General. In furtherance of this zero tolerance policy, the Secretary General is committed to ensuring:
- compliance with the Federation’s rules, regulations, policies and procedures (“Federation’s Internal Rules”) by establishing controls intended to prevent and deter their violation; and
 - that the Federation benefits from prompt notification of a possible breach of the Federation’s Internal Rules (“alleged misconduct”) so that appropriate action can be taken in the best interests of the organization; and
 - the protection of any person in the service of the Federation (“Federation Personnel”) against retaliation for reporting a suspicion of alleged misconduct or for cooperating in an authorized audit or investigation process.
- 1.2 With this in mind, the purpose of this Whistleblower Protection Policy (“the Policy”) is to:
- set out the principles and processes for reporting a suspicion of alleged misconduct;
 - establish the procedures for protecting individuals who report a suspicion of alleged misconduct from any form of retaliation; and
 - reinforce a culture in which the Federation functions and is seen to function in an open, transparent and fair manner.
- 1.3 Protection against retaliation is extended to any Federation Personnel (regardless of the type of contractual arrangement or its duration) when that individual both:
- has reported a suspicion of alleged misconduct or participated in an authorized audit or investigation, and
 - claims, on reasonable grounds, that retaliation has occurred or is apprehended, as a direct result of reporting his/ her suspicion of alleged misconduct or participating in an authorized audit or investigation.

2. Definitions, principles and procedures

2.1 Definitions

- 2.1.1 “**Alleged misconduct**” refers to allegations of a possible breach of the Federation’s Internal Rules.

- 2.1.2 **“Federation’s Internal Rules”** refers to the Staff Rules, the Staff Regulations, including the Code of Conduct and any other regulations, rules and policies adopted by the Secretary General and considered to be binding.
- 2.1.3 **“Federation Personnel”** refers to any person in the service of the Federation, including: Employees, National Staff, Seconded Staff, Staff-on-Loan, Volunteers, Interns and service providers engaged under a contractor/consultancy agreement.
- 2.1.4 **“Retaliation”** or **“retaliatory action”** means any direct or indirect detrimental action recommended, threatened or taken because an individual has reported a suspicion of alleged misconduct or participated in an authorized audit or investigation. Retaliation may include adverse administrative actions, such as, but not limited to, unwarranted poor performance evaluations, changes in job duties or other negative decisions affecting the individual’s terms and conditions of employment. Retaliation may also take the form of verbal abuse or harassment.
- 2.1.5 **“Whistleblower”** refers to an individual who reports a suspicion of a breach of the Federation’s Internal Rules. Whistleblowers provide information, based on a reasonably held suspicion that a wrongdoing has occurred.

2.2 Principles

- 2.2.1 All Federation Personnel have a duty to report potential breach of the Federation’s Internal Rules that may come to their attention, and thus help protect the organisation and the resources entrusted to it. It is also the duty of all Federation Personnel to cooperate with an authorized audit or investigation.
- 2.2.2 An individual who reports in good faith a suspicion of alleged misconduct or cooperates in an authorized audit or investigation has the right to be protected by the Federation against retaliation.
- 2.2.3 It is the Federation’s responsibility to take all necessary, relevant measures to protect Federation Personnel against retaliation in the context of a report of a suspected alleged misconduct or for participating in an authorized audit or investigation. For these reasons, the Federation maintains an environment where it can receive and address concerns and complaints in confidence.
- 2.2.4 Retaliation against individuals who have reported a suspicion of alleged misconduct or participated in an audit or investigation violates the obligation of all Federation Personnel to uphold the highest standards of integrity and to discharge their functions and regulate their conduct with the best interests of the organization in view.
- 2.2.5 When established, retaliation constitutes misconduct in itself and will be subject to appropriate administrative or disciplinary action.

2.3 Reporting a Suspicion of Alleged Misconduct through the Established Channels

- 2.3.1 A suspicion of alleged misconduct should be reported in writing as soon as possible and normally not later than 6 months after the whistleblower has come to learn of the specific event(s). The report should be factual and contain as much information as possible to allow for a proper assessment of the nature, extent and urgency of the matter.
- 2.3.2 Reports of a suspicion of alleged misconduct should be made through the established internal channels, as follows, either:
- directly to Human Resources in Geneva or in the field, or
 - to the whistleblower's line manager(s) or any Senior Manager, or
 - to the Risk Management and Audit department, or
 - through Safecall, a confidential service run by an independent third party, at ifrc@safecall.co.uk.
- 2.3.3 In all cases, the line manager or Senior Manager or the Risk Management and Audit Department shall refer the matter to the Head, Human Resources, who shall acknowledge receipt of the report of the alleged misconduct normally within three days of receipt thereof.

2.4 Reporting a Suspicion of Alleged Misconduct to Outside Entities

- 2.4.1 Federation Personnel are expected to report any suspicions of alleged misconduct through the established internal channels as stated in paragraph 2.3 above.
- 2.4.2 Nonetheless sub-paragraph 2.4.1, the Federation will also extend the protections in this Policy to a whistleblower who reports alleged misconduct by a Federation Personnel to an entity or individual outside of the Federation, on condition that the whistleblower did not accept payment or any other benefit from any party for such report, and he/she did not use the internal channels set out in paragraph 2.3 above because:
- at the time the report was made, he/she had reasonable grounds to believe that he/she will be subjected to retaliation by the person(s) he/she should report to pursuant to the internal channels; or
 - he/she could show that it was likely that evidence relating to the alleged misconduct would have been concealed or destroyed if he/she had reported to the person(s) he/she should report to pursuant to the internal channels; or
 - a previous report was made with the same information through the internal channels, and the Federation took no action.

2.4.3 In addition, the whistleblower must show that he/she reported to an outside entity because he/she considered that such reporting was necessary to avoid:

- a significant threat to public health and safety; or
- substantive damage to the Federation's operations; or
- violations of national or international law.

2.5 Confidentiality and Anonymity

2.5.1 Reports of a suspicion of alleged misconduct will be kept confidential to the maximum extent possible, consistent with the need to conduct a proper review and, if determined, an investigation. In situations whereby the whistleblower is needed to provide evidence, his/her identity shall be revealed only with his/her consent or if required by law.

2.5.2 The Federation discourages anonymous reporting as the protections extended in this Policy cannot then be accorded to the whistleblower. Notwithstanding, in case of a reasonable fear of adverse reaction from the person reasonably suspected as having committed alleged misconduct, or a superior, reports may be made anonymously through Safecall as per sub-paragraph 2.3.2 above. Any reports received by anonymous means shall be investigated at the discretion of the Federation depending on an assessment of the credibility of the information provided.

2.6 Reports made in Bad Faith

2.6.1 Anyone reporting a suspicion of alleged misconduct must be acting in good faith and have reasonable grounds for believing the information disclosed constitutes a potential breach of the Federation's Internal Rules.

2.6.2 Any report, accusation or statement that is shown to have been intentionally false, defamatory or misleading, or is made with reckless disregard as to the accuracy of the information, or is done with malice, will be considered a violation of acceptable standards of conduct and will lead to administrative or disciplinary action in accordance with the procedures applicable to the whistleblower's type of appointment.

2.7 Addressing Reports of Suspicions of Alleged Misconduct

2.7.1 Upon receipt of a report of a suspicion of alleged misconduct, the Head of Human Resources, in consultation with the Legal department shall conduct a preliminary assessment of the report. Such assessment may include preliminary fact-finding.

2.7.2 If the report might involve a fraud or financial matters, Human Resources and the Legal department will consult with the Risk Management and Audit department.

2.7.3 Human Resources and/or the Risk Management and Audit department shall investigate the matter, as deemed necessary, in accordance with the established procedures set out in the Staff Regulations and Rules, the Internal Audit Charter and the Standards of Investigations, or national law, as applicable.

2.8 Retaliation Claims

2.8.1 Individuals who have reasonable grounds to believe that retaliatory action has been taken against them, or will be taken against them, because they reported a suspicion of alleged misconduct or participated in an authorized audit or investigation should forward all information and documentation available to them to support their claim to the Head of the Human Resources department.

2.8.2 The retaliation claim should be made as soon as possible and in any case normally no later than 6 months after the date of the alleged act of retaliation has occurred (or the date of the last act of retaliation if a series of such acts is alleged to have occurred).

2.8.3 The functions of the Human Resources department with respect to protection against retaliation are as follows:

- to receive and acknowledge a retaliation claim;
- to keep a confidential record of all claims received; and
- to conduct a preliminary review of the claim to determine if there is a *prima facie* case that the reporting of the alleged misconduct or the participation in the authorized audit or investigation was a contributing factor in causing the alleged retaliation.

2.8.4 If the Head of the Human Resources department finds that there is a *prima facie* case of retaliation or threat of retaliation, he/she will refer the matter to the Secretary General with a recommendation that the claim be investigated in accordance with the applicable procedures.

2.8.5 The Human Resources department shall notify the whistleblower that the matter has been referred to the Secretary General, and of the Secretary General's decision thereon.

2.9 Interim Measures

2.9.1 Pending the completion of the investigation and without prejudice to its outcome, the Head of the Human Resources department may on the basis of its own preliminary review recommend that the Secretary General take appropriate interim measures to safeguard the protection of the claimant, including but not limited to temporary suspension of the implementation of the action reported as retaliatory and, with the

consent of the claimant, his/ her temporary reassignment or, to the extent necessary, his/her placement on special leave with full pay.

2.10 Measures in respect of a finding of Retaliation

2.10.1 If retaliation is established, the Head of the Human Resources department will, after consultation with the Legal department and, as appropriate, the Risk Management and Audit department, and the individual concerned who has suffered retaliation, recommend to his/her manager(s) appropriate measures aimed at correcting negative consequences suffered as a result of the retaliatory action. Such measures may include, but are not limited to, the withdrawal of the retaliatory decision, or other actions such as reinstatement or a transfer, if applicable, with the individual’s consent to another office away from the person who engaged in retaliation.

2.11 Action against a Federation Personnel who engages in Retaliation

2.11.1 Any retaliatory actions by a Federation Personnel against a whistleblower, including a contractor or its employees or representatives, or any other individual engaged in any dealings with the Federation, because such person has reported alleged misconduct is a violation of the Federation’s standards of conduct and will lead to appropriate administrative or disciplinary actions in accordance with the applicable procedures.

2.12 Internal Recourse Procedures

2.12.1 The procedures set out in this Policy are without prejudice to the rights of the whistleblower who has suffered retaliation, or the individual who is found to have engaged in retaliation, to appeal or seek redress, as the case may be, through the internal recourse mechanisms applicable to their type of appointment.

3. Related documents

File number	Name	Version
	Staff Regulations and Rules Code of Conduct	
085	Standards of Investigation	
086	Internal Audit Charter	

4. Document revision history

Version	Date	Details
