

POLICY



HANDLING OF SENSITIVE COMPLAINTS IN DANISH RED CROSS

Whistle Blower Policy

JUNE 2020

1 THE PURPOSE OF THE POLICY

Danish Red Cross encourages open communication. All stakeholders, hereunder staff, partners, members, volunteers, beneficiaries, donors and others, are welcome to report issues such as suspicion about illegal acts or other serious matters related to Danish Red Cross activities or other activities connected to Danish Red Cross.

The purpose of the policy is to:

- Give you a sense of security in reporting suspicious incidents if you have doubts as to the procedures connected to the whistle blower policy
- Explain how to report your concern
- Ensure that you are protected from reprisals or other persecution when your complaint is made in good faith

2 WHAT CAN BE REPORTED

The whistle blower system can be used to report breach of Danish Red Cross policies or suspicion thereof, as related to Danish Red Cross staff or others acting on behalf of Danish Red Cross.

Examples of issues that can be reported via the whistle blower system:

- Illegal and unethical behaviour
- Economic crime, hereunder embezzlement, bribery, fraud and forgery
- Physical violence and sexual exploitation, abuse and harassment
- Discrimination and bullying
- Unlawful use of child labour
- Misuse of Danish Red Cross funds and assets
- Corruption

If you are employed at Danish Red Cross and have concerns around matters listed above, your first point of contact is your manager, employee representative or HR partner. It is their responsibility to handle such issues. The whistle blower system is intended for use, when the normal communication lines are not possible to use.

3 HOW TO REPORT SUSPICION

If you are employed at Danish Red Cross you should initially, under normal circumstance, report issues of concern to your own manager. If you think your manager is directly involved in the incident, you should report to your manager's supervisor and as a last resort the whistle blower system. If you are in doubt where to report an issue, the whistle blower system can be used to seek advice. The whistle blower system is available at Danish Red Cross website.

If you are not employed at Danish Red Cross and thereby do not have access to management in Danish Red Cross, you can report to Danish Red Cross via the whistle blower system incident report template, available at Danish Red Cross website.

Your message is received by Danish Red Cross General Counsel and Director of Finance.

In your report please include:

- Background and facts
- The reason why you are concerned about the issue or situation that you are reporting

The earlier you report the incident, the better it is for Danish Red Cross to act and to ensure no further harm is done.

While you are not expected to provide conclusive evidence in support of your complaint, we expect that you will be able to demonstrate a reasonable ground for your suspicion.

4 ANONYMOUS AND CONFIDENTIAL

Reports can be made anonymously. If possible, Danish Red Cross encourages you to give your identity when reporting for us to be able to follow up with additional questions and provide you with feedback. If you are in a position where you are not able to give your name and personal contact details, we would highly appreciate if you provide us with alternative ways to communicate.

All reports will be handled confidentially, regardless of whether it is reported anonymously or not.

Danish Red Cross does not tolerate harassment, persecution or indirect pressure, and will take the necessary measures to protect you as long as your complaint is made in good faith.

5 HANDLING COMPLAINTS

Upon receipt of a complaint the content will be shared with a limited number of persons in the relevant department, the complaints will be treated in confidence. The relevant department will initiate an initial assessment of the content.

If the complaint is manifestly unfounded, it will be rejected and deleted in the system. If you have provided contact details, we will contact you with that message and explain the reason.

If the initial assessment concludes that the complaint has a legitimate basis, we will proceed with a further investigation.

Complaints may have employment-related consequences for the person against whom the complaint is made. Danish Red Cross will take full responsibility for employment-related consequences in accordance with established HR procedures.

Some cases can be solved by intervention without further investigation. If it is necessary to act promptly, we will do so prior to further investigation.

A complaint may be of such a nature that it will be reported to the police for further investigation.

6 FALSE COMPLAINTS

It is important the whistle blower system is not used for inappropriate allegations towards innocent persons. All reports must be reported in good faith. *On the contrary*, if you make a complaint that is frivolous, malicious or for personal gain, it can have employment-related or legal consequences.

7 INFORMATION TO PERSONS IMPLICATED IN A COMPLAINT

In accordance with data protection law, the person towards whom a complaint has been made will be informed. Danish Red Cross will inform the person at an appropriate time, depending on the severity of the report and the investigation required. Such notice may be delayed in order to ensure the collection of evidence.

No information will be shared about the identity of the complainant.