



Canadian
Red Cross
Croix-Rouge
canadienne

Name: Canadian Red Cross Integrity Protection Policy	
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Integrity Protection

Preamble

As the most respected humanitarian agency in Canada, and as part of the most respected humanitarian Movement in the world, the Canadian Red Cross' mission is to serve the most vulnerable in Canada and around the world. Our ability to do so is dependent upon the strength of our reputation. Donors, volunteers, partners, members and employees give their time, money and talent to our work because they believe in our mission and in the organization's ability to steward their gifts with integrity. We continuously strive to foster environments that live up to our Fundamental Principles, Core Values and Code of Conduct.

The reputation of the Canadian Red Cross is shaped by the individual actions of every employee and volunteer. Unethical behaviour can seriously undermine the efforts of all our employees and volunteers to serve the most vulnerable. As such, it is important that we have safe and consistent ways of dealing with sensitive issues in order to ensure that our behaviour is beyond reproach.

Our *Code of Conduct* is aimed at ensuring that employees and volunteers respect existing laws and regulations, and properly guide their decisions and actions with integrity and good judgment. This *Integrity Protection* policy complements the rules and procedures already existing in the *Code of Conduct* that deal with issues and concerns that may arise from time to time.

1. Policy Statement

- This policy provides a means whereby issues and/or concerns relating to integrity may be safely and effectively reported to Management.
- The Canadian Red Cross will act fairly with respect to any individual named in a report, taking into account the seriousness of the issue or concern raised, the credibility of the information or allegations in the report, and the prospect of an effective disposition of the matter.
- The Canadian Red Cross will not retaliate, and will not condone retaliation against any person for reporting, in good faith, an issue or concern to which this policy applies.
- This policy applies to all staff and volunteers of the Canadian Red Cross working both domestically and in our international delegations.

2. Scope of Reporting

This policy is designed to provide individuals with a confidential method of reporting issues and concerns to Management. Employees and volunteers are always welcome and encouraged to speak to their supervisors or local Human Resource teams.

This policy governs the reporting of issues and concerns regarding any of the following matters:

- Financial Reporting and Accounting Irregularities
- Unethical Conduct and Conflict of Interest
- Manipulation or Falsification of Data
- Harm to People or Property

- Theft, Embezzlement, Fraud
- Violation of Laws or Regulations
- Child Protection
- Breaches of the *Code of Conduct*

3. Protection against Retaliation

Neither the Canadian Red Cross nor any of its directors, officers, employees or agents shall penalize, discharge, demote, suspend, threaten, harass, transfer to an undesirable assignment or location or otherwise discriminate or retaliate against any person for reporting in good faith a matter under this policy. "Good faith" means: i) that a person reasonably and honestly believes that the issue or concern he or she is reporting either falls or has the potential to fall, within the scope of section 2 of this policy and that the facts reported are true; and ii) that the report has not been made either for personal gain or for any other ulterior motive.

This protection extends to anyone who provides information in relation to the handling of the matter.

Any act or attempted act of retaliation shall be treated as a serious violation of this policy and could result in disciplinary action up to and including discharge from employment or other status or responsibilities.

The right to protection against retaliation does not include immunity for any personal wrongdoing that is established to have been committed by the person reporting the matter.

4. Confidentiality

The Canadian Red Cross will treat all reports as confidential to the fullest extent permitted by law. Persons reporting issues and concerns are encouraged to put their names to reports. However, reports can also be made anonymously, recognizing that the Society's ability to fully investigate anonymous reports can be limited.

5. How to Make a Report

Employees and volunteers are encouraged to report issues and concerns to their supervisor or to the Human Resources department.

In addition, the Society provides a confidential third party, **Clearview Connects**, to receive reports. Reports to Clearview Connects can be made in English, French or Spanish. Should another language be required Clearview Connects will provide translation upon request. Reports can be made through Clearview Connects in the following ways:

1. Online through a secure website at <http://www.clearviewconnects.com/>
2. Within North America: over the phone through the **Canadian Red Cross dedicated toll-free number 1-866-284-7015**
3. Outside North America call collect to: 905-280-1510. You do not need to provide your name, simply identify yourself as Canadian Red Cross.
4. By mail through the confidential post office box at:
P.O. Box 90505
Toronto, Ontario
M1J 3N7

Reports should provide sufficient, precise and relevant information pertaining to the specific details of the issue or concern, dates, places, persons/witnesses, numbers, etc., so that a reasonable review can be conducted.

6. Review and Response

Upon receiving a report through the Clearview Connects system, either the CFO/COO or the National Director Human Resources and Volunteer Services*, as applicable, shall:

- Acknowledge receipt of the report.
- Determine whether the report pertains to a matter within the scope of this policy and, if not, advise the person accordingly and refer the report to other appropriate channels.
- Seek further clarification as needed through the tools provided by Clearview Connects.
- Determine the most appropriate method of reviewing and responding to the matter as quickly as possible, taking into account the nature and complexity of the matter and the issues raised therein.
- Provide to the Secretary General and the Board of Governors periodic information (while respecting confidentiality) on the nature and frequency of reports and the progress of responses.

**Note: if the CFO/COO or the National Director Human Resources and Volunteer Services is the subject of a report, the person will be provided the option to direct the report to the Secretary General.*

In conducting an investigation, the CFO/COO or National Director Human Resources and Volunteer Services may delegate to or enlist the assistance of: inside or outside legal counsel, accounting, human resources, or other internal/ external advisors, as appropriate. Those involved in a response to a report shall have access throughout to all books and records of the organization. Canadian Red Cross directors, officers, employees and agents are required to fully co-operate in a response effort, and to make all reasonable efforts to protect the confidentiality required under this policy at all times.

Every reasonable effort will be made to recognize the importance of confidentiality to all parties involved in the reporting of and response to a matter, and to balance confidentiality with the legal responsibility to create a safe environment in the workplace. All documentation will be filed separately from employee and volunteer files.

The Canadian Red Cross will comply with all legislation regulating the conduct of employees in terms of discrimination and harassment. Violation of such standards will be considered incompatible with this policy and subject to discipline.

Reports and related documentation shall be maintained in a secure and confidential manner.

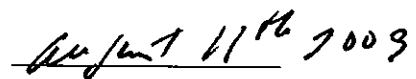
7. Monitoring and Reporting

Each quarter, the CFO/COO and National Director Human Resources and Volunteer Services shall report to the Secretary General, National Audit and Finance Committee (NAFC), and Board in the aggregate, the number, nature, and outcome of reports received and handled under this policy.

Notwithstanding the foregoing, the CFO/COO and National Director Human Resources and Volunteer Services shall immediately advise the Secretary General, NAFC and Board of any report that may have material consequences for the Canadian Red Cross.



Secretary General



Date