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## **INTEGRITY PROTECTION**

### **POLICY STATEMENT:**

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 improve the lives of vulnerable people by mobilizing power of humanity in Canada and globally. Our ability to do so is dependent upon the strength of our reputation. Donors, volunteers, partners, delegates 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, volunteer and delegate. Unethical behaviour seriously undermines the efforts of our entire workforce to serve the most vulnerable. As such, it is important that we have safe and consistent ways of reporting and dealing with sensitive issues in order to ensure that our behaviour is beyond reproach.

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

### **PURPOSE**

This policy provides a means to safely, confidentially and effectively report issues or concerns relating to integrity to management. The Canadian Red Cross will be fair to any individual named in a report, and will take into account all relevant circumstances including the seriousness of the issue or concern raised, the credibility of the information or allegations, and the prospect of an effective disposition of the matter.

The Canadian Red Cross will not retaliate, and will not condone or permit retaliation, against any person for reporting, in good faith, an issue or concern under this policy.

### **SCOPE:**

This policy applies to all staff and volunteers of the Canadian Red Cross working both domestically and in our international delegations. It is designed to provide individuals with a confidential method to report issues and concerns to management. Employees, volunteers and delegates are also always welcome and encouraged to speak to their supervisors or People Services teams.

This policy governs the reporting of issues and concerns including the following:

- i. Financial Reporting and Accounting Irregularities
- ii. Unethical Conduct and Conflict of Interest
- iii. Manipulation or Falsification of Data
- iv. Harm to People or Property

- v. Theft, Embezzlement, Fraud
- vi. Violation of Laws or Regulations
- vii. Child Protection
- viii. Breaches of the [\*Code of Conduct\*](#)

## **DEFINITIONS:**

Please refer to [1.1-General Definitions](#) for definitions of employee, volunteer and delegate.

**Fundamental Principles** means the Fundamental Principles of the International Red Cross and Red Crescent Movement.

## **PROCEDURE AND APPLICATION:**

### A. 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 retaliate or discriminate in any way against any person for reporting in good faith a matter under this policy. “Good faith” means:

- i. the person reasonably and honestly believes that the issue or concern they are reporting either falls, or has the potential to fall, within the scope of this policy and that the facts reported are true; and
- ii. the report is not made for personal gain or for any other ulterior motive.

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

Any act or attempted or threatened act of retaliation shall be treated as a serious violation of this policy and may result in disciplinary action up to and including discharge from employment or termination of 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.

### B. Confidentiality

The Canadian Red Cross will treat all reports as confidential to the fullest extent permitted by law, and shall share or disclose information only as required to fully investigate the report and address the issues identified. Persons reporting issues and concerns are encouraged to put their names to reports, but reports may also be made anonymously; recognizing however that the Society’s ability to fully investigate anonymous reports may be limited by the lack of information.

### C. How to Make a Report

Employees, volunteers and delegates are encouraged to report issues and concerns to their supervisor or to the People Services department.

In addition, the Society provides a confidential third party service, **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. Be sure to identify yourself as Canadian Red Cross. Reports can be made through Clearview Connects in the following ways:

- i. Online through a secure website at <http://www.clearviewconnects.com/>
- ii. Within North America call to:  
**Canadian Red Cross dedicated toll-free number 1-866-284-7015**
- iii. Outside North America call collect to:  
**905-280-1510** (you do not need to provide your name: simply identify yourself as Canadian Red Cross)
- iv. By mail through the confidential post office box at:  
**Clearview Connects  
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.

### D. Review and Response

Upon receiving a report through the Clearview Connects system, the Chief of Staff or the Vice President, People Services, shall:

- i. Acknowledge receipt of the report;
- ii. 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;
- iii. Seek further clarification as needed through the tools provided by Clearview Connects;
- iv. 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;
- v. Provide to the President and CEO and the Board of Directors periodic information (while respecting confidentiality) on the nature and frequency of reports and the progress of responses.

*\*Note: If the Chief of Staff or the Vice President, People Services is the subject of a report, the person will be provided*

*the option to direct the report to the President and CEO.*

In conducting an investigation, the Chief of Staff and Vice President, People Services may delegate to or enlist the assistance of inside or outside legal counsel, accounting, human resources, or other internal and external advisors, as appropriate. Those involved in responding to a report shall have access to all books and records of the organization, and Canadian Red Cross directors, officers, employees, volunteers, delegates 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 workplace environment. All reports and documentation will be filed and maintained separately from employee, volunteer and delegate files, and shall be maintained in a secure and confidential manner.

The Canadian Red Cross will comply with all legislation regulating the conduct of all personnel with respect to discrimination and harassment. Violation of legal standards will be considered incompatible with this policy and subject to discipline.

**RESPONSIBILITIES:**

1. Each quarter, the Chief of Staff and Vice President, People Services shall report to the President and CEO, National Audit and Finance Committee (NAFC), and the Board of Directors, aggregated information regarding the number, nature, and outcomes of reports received and handled under this policy.
2. Notwithstanding the foregoing, the Chief of Staff and Vice President, People Services shall immediately advise the President and CEO, NAFC and the Board of Directors of any report that may have material consequences for the Canadian Red Cross.