

WHISTLEBLOWING POLICY: PROCEDURE TO REPORT CONCERNS INTERNALLY FOR STAFF MEMBERS

The present whistleblowing /reporting mechanism is established for complaints by the staff within the Foundation about situations that do not relate to their job's role and employment contract.

The whistleblowing policy is intended to cover major concerns. These include:

- Behavior that substantiates a crime or an activity that violates local, Italian and international laws
- Behaviors that substantiate health and safety risks, for both colleagues and for the beneficiaries
- Unauthorized use of the organization's funds
- Possible fraud or corruption
- Physical, psychological or sexual abuse on beneficiaries or on the staff of the Foundation
- Other behaviors in violation of the organization's code of ethics

Any serious concerns that you have about any aspect of the activities/ services of the Foundation or the conduct of employees or others acting on behalf of the Foundation can be reported under the whistleblowing policy. Such as:

- When some activity or behavior makes you feel uncomfortable in terms of recognized standards, in respect to your experience or in respect to the standards you believe the Foundation requires.
- When some activity or behavior is against the Foundation's principles or policies.
- When some activity or behavior falls below or is against established standards of practice in the humanitarian aid context.

SAFEGUARDS

HARASSMENT OR VICTIMIZATION

The Foundation is committed to good practice and high standards and wants to be supportive of employees.

It is recognized that the decision to report a concern can be a difficult one to make. If what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer and for the beneficiaries of the Foundation's activities.

The management will not tolerate any harassment or victimization (including informal pressures) and will take appropriate action to protect those who raise a concern in good faith.

Any investigation into allegations of potential malpractice will not influence or be influenced by your contractual situation or by any disciplinary procedures that may affect you.

Finally, the Foundation thanks those who are diligent enough to formally make note of any suspicions of serious irregularities as defined above and it is aware that prosecution is mandatory when a crime is involved.

CONFIDENTIALITY

All the people involved will be treated with adequate confidentiality both the victim and the person who would have held the behavior in question following the principle of presumption of innocence.

Every effort will be made not to reveal your identity if you so wish. However, if one makes allegations, you may need to come forward as a witness.

ANONYMOUS ALLEGATIONS

The Foundation encourages you to put your name on the complaint. The anonymous complaints have much less weight, but will be taken into consideration, at the discretion of the Management, according to the following criteria:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources.

UNTRUE ALLEGATIONS

If you make an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against you. If, however, you make an allegation frivolously, maliciously or for personal gain, disciplinary action may be taken against you.

HOW TO RAISE A CONCERN

- 1) As a first step, you should normally raise concerns with your immediate manager/ their superior/line HR. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice.
- 2) In case you are not able to follow the line of authority for justifiable reasons, you may send your allegations to the following email: reclami@tdhitaly.org
- 3) The allegations can be made verbally or written. The staff member that prefers to send a written report must follow this format:
 - a. Context and description of the matter with information of precise dates and any details
 - b. The reason why you are particularly concerned about this situation
- 4) The sooner the facts are reported, the easier it is to take action.
- 5) Although you are not expected to prove beyond doubt the truth of an allegation, you will need to demonstrate to the person contacted that there are reasonable grounds for your concern.
- 6) You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

HOW THE FOUNDATION WILL RESPOND

The Foundation will respond to your concerns. Do not forget that verifying your concerns is not the same as either accepting or rejecting them.

According to the case, the matters raised may:

- Be investigated internally by the management
- Be referred to an expert legal consultant
- Be referred to the police
- Be analyzed by an external auditor in the case of complaints related to financial damages.

Initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take in order to protect individuals and those accused of misdeeds or possible malpractice.

The overriding principle of the Foundation is the protection of the beneficiaries and the defense of the humanitarian activities of the organization.

Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

Within 10 days from the date of the complaint, the person in charge will answer:

- Acknowledging that the concern has been received and indicating how we propose to deal with the matter, giving an estimate of how long it will take to provide a final response
- Informing whether any initial enquiries have been made; whether further investigations will take place and if not, why not.
- Possibly providing information on the support that will be given to the persons involved.

If a decision is made to raise the matter outside the Foundation, it is advisable that no confidential information is disclosed, and it must be first discussed with the manager of the Foundation who will consult with the appropriate experts.

If responsibilities by staff members are confirmed, the Organization will refer to the sanction mechanism provided for in existing contracts and regulations, which can go as far as dismissal

The Foundation will keep track of any procedure. Documents and allegations will be stored in a safety way under the responsibility of the “Responsible officer” in accordance with the current privacy legislation

RESPONSIBLE OFFICER

In the delegation offices: usually the Country Manager or the Regional Manager

[\(first initial\).Lastname@tdhitaly.org](mailto:(first initial).Lastname@tdhitaly.org)

At the headquarters: The President of the Foundation or any other delegate by the board

reclami@tdhitaly.org

These people will have the overall responsibility for the maintenance and operation of this policy. They will then keep an archive of all the reports received and their results and will regularly report to the Head Office.

COMPLAINT POLICY: PROCEDURES FOR FILING COMPLAINTS BY PEOPLE OUTSIDE THE FOUNDATION

The present mechanism is established for complaints made by beneficiaries or persons outside the Foundation for unlawful or inappropriate situations or behaviors.

PRINCIPLES

- Any type of complaint will be taken into consideration and treated with seriousness, whether anonymous or not.
- However, anonymous complaints will be considered on the basis of the following criteria:
 - o The seriousness of the facts reported
 - o The credibility of the complaint
 - o The possibility of having confirmation of accusations from non-anonymous sources
- Outline of the next steps and the possible timeframe will be sent within a short time to the person who sent the complaint
- The presumption of innocence will be central at any point in the process
- The Foundation will keep track of any procedure. Documents and allegations will be stored in a safety way under the responsibility of the “Responsible officer” in accordance with the current privacy legislation

STANDARDS FOR THE MANAGEMENT OF COMPLAINTS

Complaints will be managed as best as possible at the local level while in coordination with the headquarters’ managers. The chain of those who will receive the complaint is as follows.

- The Delegate/ Country Manager: (first initial).Lastname@tdhitaly.org
- The Desk Officer at the headquarters: (first initial).Lastname@tdhitaly.org
- The President of the Foundation or any other delegate by the board: reclami@tdhitaly.org

They will be the people in charge of receiving the complaints presented by external parties, according to the type and seriousness of the allegations. The contacts of these people will be posted at the delegation office and / or in the bases/ places where the activities in the field are coordinated.

It is necessary to evaluate the situations that each delegate in the various countries face and to adjust the procedures according to their characteristics, but there are some standards to follow:

- 1) Establish and inform partners and beneficiaries of the existence of a complaints procedure, specifying who, how and where and with what limitations (if applicable) one can make a complaint.
- 2) Provide different types of contact possibilities, considering the availability of infrastructures in the communities and the characteristics of the area and the type of intervention (paper reporting, by e-mail, verbally at the office or to a committee, post box or register book accessible to all).
- 3) Determine which sector / job role is responsible for managing the complaints and the creation of a register of all reports with a protocol number, date, actions considered and timing for the response.
- 4) A confirmation receipt of the report should be sent immediately, indicating if the complaint can be taken into consideration and if not, explaining the reason.
- 5) Establish a maximum time for the definitive answer to the complaint (ideally 30 days); if the situation is more complex and this is not possible, a second communication should be sent explaining the reasons for the delay and giving a new timeframe.
- 6) Focus on the verification of the facts, which differs from the criminal investigation which is the responsibility of the police. Collect documents and information to eventually submit to a legal expert or the police.

- 7) If specific facts identify a crime, immediately inform the headquarters to proceed to a police report as soon as possible.

INTERNAL MANAGEMENT

If the complaint can be resolved directly within the organization, one must find the best solution / best approach possible to resolve the situation, take the necessary measures and respond to those who have made the complaint.

There is no standard solution, but each complaint must be evaluated in detail. A detailed knowledge of the relevant regulatory framework and the social, political and economic context may be required; in this case support from an external expert can be considered.

REFERING THE CASE TO OTHERS

If the verification and analysis of the facts shows that the complaint cannot be treated by the Foundation or it is thought that another organization can manage it more effectively, or if it refers to issues on which the organization has no direct responsibility, the complaint must be referred to the most appropriate body or person, according to the Referral Policy of the Foundation.

In this case:

- 1) Before referring the case, one must discuss with the relative institution to understand if and how they will handle the complaint. It is important to make sure that the principles of confidentiality and protection against retaliation are respected.
- 2) Inform who has filed the complaint and request consent to refer the case, explaining the reason and providing the new contacts of where the case was referred to.
- 3) Even if the case is not in the hands of the Foundation, you must follow the progress of the report and provide support where needed. In certain cases, it may be appropriate to build a relationship with the external partners to establish a memorandum of understanding (MOU) for a future collaboration of similar cases.
- 4) Consult and exchange information with partners on good practices to be held.

Approved:

August 2018



Donatella Vergari Secretary General



Raffaele Salinari President

Last Updated:

June 2020

A handwritten signature in blue ink, appearing to read "Donatella Vergari".

Donatella Vergari President

A handwritten signature in blue ink, appearing to read "Paolo Ferrara".

Paolo Ferrara Director General