

GHANA RED CROSS SOCIETY

WHISTLE BLOWER PROTECTION POLICY



Whistleblower Protection Policy

Ghana Red Cross Society

1. Purpose, Scope and Audience

1.1 The Ghana Red Cross Society (GRCS) maintains a zero-tolerance policy toward any form of retaliation against individuals who, in good faith, report reasonably held suspicions of breaches of the GRCS Internal Rules or who cooperate in audits or investigations authorized by the Secretary General. In furtherance of this commitment, the Secretary General shall ensure:

- **Compliance** with GRCS rules, regulations, policies and procedures (“Internal Rules”) by establishing appropriate controls to prevent violations;
- **Prompt reporting** of possible breaches (“alleged misconduct”) so that appropriate action can be taken in the best interests of the organization; and
- **Protection** of any person engaged by the GRCS (“GRCS Personnel”) from retaliation for reporting alleged misconduct or cooperating in an authorized audit or investigation.

1.2 The purpose of this Whistleblower Protection Policy (“Policy”) is to:

- Define principles and processes for reporting suspicions of misconduct;
- Establish procedures to protect individuals from any form of retaliation; and
- Promote a culture of openness, transparency, and accountability within the GRCS.

1.3 Protection against retaliation applies to all GRCS Personnel, regardless of contractual status or duration—when an individual both:

- Reports a suspicion of misconduct or participates in an authorized audit or investigation, and
- Has reasonable grounds to believe that retaliation has occurred or is imminent as a direct consequence.

2. Definitions, Principles and Procedures

2.1 Definitions

- **Alleged Misconduct:** Any suspected breach of the GRCS Internal Rules.
- **Internal Rules:** The Staff Rules and Regulations, including the Code of Conduct, and any other policies and procedures adopted by the Secretary General as binding.

- **GRCS Personnel:** All persons engaged in the service of the GRCS, including Employees, National Staff, Seconded Staff, Staff-on-Loan, Volunteers, Interns, and service providers under contractual arrangements.
- **Retaliation / Retaliatory Action:** Any direct or indirect detrimental action threatened, recommended, or taken because an individual has reported a suspicion of misconduct or participated in an authorized audit or investigation. Examples include adverse administrative measures (e.g., unjustified poor performance evaluations, unwarranted changes to duties, or negative employment decisions) and verbal abuse or harassment.
- **Whistleblower:** An individual who reports a reasonably held suspicion of misconduct.

2.2 Principles

2.2.1 All GRCS Personnel have a duty to report potential breaches of Internal Rules and to cooperate fully in authorized audits and investigations.

2.2.2 Individuals who, in good faith, report suspected misconduct or cooperate in authorized reviews have the right to protection from retaliation.

2.2.3 The GRCS shall take all necessary measures to safeguard whistleblowers against retaliation and shall maintain processes that enable confidential reporting and handling of concerns.

2.2.4 Retaliation against whistleblowers or participants in audits or investigations contravenes GRCS's core values of integrity and accountability and constitutes misconduct in itself.

2.2.5 Confirmed retaliation will result in appropriate administrative or disciplinary measures.

2.3 Reporting Alleged Misconduct through Internal Channels

2.3.1 A suspicion of misconduct should be reported in writing as soon as possible, preferably within six months of becoming aware of the event(s). Reports should be factual and detailed enough to enable assessment of the nature, scope, and urgency.

2.3.2 Reports may be submitted via:

- Human Resources;
- The individual's line manager or any Senior Manager; or
- The Integrity Line (<https://ifrc.integrityline.org/>), a confidential reporting service.

2.3.3 All reports received by a manager or Senior Manager shall be referred promptly to the Head of Human Resources, who will acknowledge receipt within three working days.

2.4 Reporting to External Entities

2.4.1 As a principle, GRCS Personnel are expected to report suspicions of misconduct internally as set out above.

2.4.2 Nevertheless, protections under this Policy will extend to whistleblowers who report externally, provided that:

- They did not accept payment or any other benefit for the report; and
- They refrained from using internal channels because:
 - They reasonably believed they would be subjected to retaliation if reported internally; or
 - There was a credible risk that evidence would be concealed or destroyed; or
 - A prior internal report had been made without action taken.

2.4.3 Additionally, the whistleblower must reasonably believe that external reporting was necessary to prevent:

- A significant threat to public health or safety;
- Serious damage to GRCS operations; or
- Violations of national or international law.

2.5 Confidentiality and Anonymity

2.5.1 Reports will be kept confidential to the maximum extent possible, consistent with proper review and investigation requirements. Where the whistleblower's evidence is required, their identity will be disclosed only with their consent or if required by law.

2.5.2 While anonymous reporting is discouraged—since the Policy's protections cannot be fully guaranteed—reports may be submitted anonymously via the Integrity Line if there is a legitimate fear of reprisal. Anonymous reports will be assessed and investigated at the discretion of GRCS, based on credibility and the seriousness of the information provided.

2.6 Reports Made in Bad Faith

2.6.1 Reports must be made in good faith with reasonable grounds for believing the information constitutes a breach of Internal Rules.

2.6.2 Reports found to be intentionally false, defamatory, malicious, or recklessly inaccurate will constitute misconduct and may result in administrative or disciplinary action.

2.7 Addressing Reports of Suspected Misconduct

2.7.1 Upon receiving a report, the Head of Human Resources, in consultation with the Legal Department, will conduct a preliminary assessment, which may include fact-finding.

2.7.2 If the report concerns fraud or financial matters, the Risk Management and Audit Department will also be consulted.

2.7.3 Investigations will be conducted as necessary, in line with applicable Staff Regulations, the Internal Audit Charter, Standards of Investigation, and relevant national laws.

2.8 Retaliation Claims

2.8.1 Individuals who reasonably believe they have been or will be subjected to retaliation should submit all relevant information to the Head of Human Resources as soon as possible, and no later than six months from the date of the alleged retaliatory act (or last act if multiple incidents).

2.8.2 The Human Resources Department is responsible for:

- Receiving and acknowledging retaliation claims;
- Maintaining confidential records of all claims; and
- Conducting a preliminary review to determine whether a prima facie case exists that the protected activity contributed to the alleged retaliation.

2.8.3 If a prima facie case is established, the matter shall be referred to the Secretary General with a recommendation for further investigation.

2.8.4 The whistleblower will be notified of the referral and of the Secretary General's decision.

2.9 Interim Measures

2.9.1 Pending investigation and without prejudice to its outcome, interim protective measures may be recommended by the Head of Human Resources to the Secretary General. Such measures may include:

- Suspension of the alleged retaliatory action;
- Temporary reassignment; or
- Special leave with full pay, with the whistleblower's consent.

2.10 Measures Following a Finding of Retaliation

2.10.1 Where retaliation is confirmed, corrective measures will be recommended after consultation with Legal, Risk Management and Audit, and the affected individual. Remedies may include reversing the retaliatory action, reinstatement, reassignment, or other appropriate actions, subject to the individual's consent.

2.11 Action Against Retaliators

2.11.1 Any GRCS Personnel, including contractors or representatives, found to have engaged in retaliation will be subject to disciplinary or administrative action in accordance with applicable procedures.

2.12 Internal Recourse Procedures

2.12.1 This Policy does not limit the rights of whistleblowers who suffer retaliation, or individuals subject to findings of retaliation, to seek redress or appeal under the internal recourse mechanisms applicable to their appointment.