

# DANISH RED CROSS WHISTLEBLOWER POLICY

22 February 2021



## 1. The purpose of the policy

The purpose of the DRC whistleblower policy is to set the framework for the Danish Red Cross' whistleblower scheme which, in addition to the Danish Red Cross' usual reporting channels, can be used to report suspected illegal and irregular behavior that may have a negative impact on the Danish Red Cross as an organization.

The Danish Red Cross has established a whistleblower scheme, which is handled by the Danish Red Cross with the assistance of Kammeradvokaten lawfirm.

## 2. The Danish Red Cross' position on whistleblowing and complaints

The Danish Red Cross wants to prevent all forms of corruption, fraud, sexual exploitation and abuse of power. If you are aware of illegal acts or suspect that illegal acts or irregular behavior is taking place within the Danish Red Cross, we would very much like to hear about it. We do our utmost to protect informants and victims and therefore make a confidential whistleblower portal available for reporting serious matters. The foundation of our work with whistleblowing and complaints in general is security, confidentiality, respect and justice. If we make mistakes or are complicit in illegal behavior, we want to hear about it so that we can act on the specific cases and learn and improve ourselves, thus preventing the recurrence of mistakes and undesirable behavior.

## 3. Who can make a report using the whistleblower scheme?

The whistleblower scheme can be used by employees, volunteers, partners and others who participate in or contribute to the Danish Red Cross' activities. The whistleblower portal is publicly available on the Danish Red Cross' website at [www.rodekors.dk](http://www.rodekors.dk) and can therefore be accessed by anyone.

## 4. How do you make a report?

You report issues in writing via the whistleblower portal on the Danish Red Cross website.

On the reporting page, you will be asked to describe what your suspicions are or what you know about, as well as provide detailed information if you wish.

You can attach any documentation to the report.

## **5. What can be reported via the whistleblower scheme?**

The whistleblower scheme can be used to report serious or suspected serious breaches and concerns regarding the conduct of Danish Red Cross employees or others acting on behalf of the Danish Red Cross. Serious breaches and misconduct can be, for example:

- Economic crime such as embezzlement, bribery, fraud and forgery
- Physical violence and sexual abuse, assault or violation
- The practice of unlawful discrimination
- Use of child labour
- Human rights violations
- Aggravated harassment
- Unauthorised use of Danish Red Cross funds
- Corruption
- Other illegal conduct

When you submit a report via the whistleblower scheme, this presupposes that you have knowledge of or a reasonable suspicion of a serious breach or misconduct. This means that, in principle, other concerns about misdemeanors are not to be reported via the whistleblower scheme.

### ***Concerns to be handled by local management/HR:***

If you are an **employee or volunteer**, and your concerns are about misdemeanors other than the above, you should contact your local management or the Danish Red Cross' HR Department, as such matters must as a rule be handled via the usual communication channels, e.g. to the line manager or employee representative. Such matters could be, for example:

- Complaints about day-to-day staff or employee relations in the form of co-operation difficulties, incompetence, poor management or bullying
- Cases concerning illness, absence or trade union relations
- Violation of the Danish Red Cross' internal rules regarding alcohol, drugs and smoking, etc., unless there is a risk that such a violation will lead to personal injury or property damage

However, the whistleblower scheme can be used if it is not possible to use the normal communication channel within the Danish Red Cross.

## **6. How do we handle the report?**

Reports are received by our external partner, Kammeradvokaten. Kammeradvokaten initially assesses whether the case is covered by the whistleblower scheme and, if possible, acknowledges receipt of the case to you as the informant.

If the Kammeradvokaten believes that the case falls under the whistleblower scheme, the report is passed on to the Danish Red Cross for further processing. We set up a complaints committee, which involves the necessary persons to be able to process the report, which is always treated confidentially.

If the outcome of the proceedings shows that there is no evidence that irregularities have taken place, the persons involved will be informed.

If the case processing reveals reprehensible circumstances, there are different reaction possibilities:

- If there has been a violation of criminal law, this will be reported to the police.
- If the case concerns serious errors and omissions or serious violation of the Danish Red Cross' policies, Code of Conduct and other guidelines committed by an employee of the Danish Red Cross, this may have implications under employment law, such as a warning or dismissal.
- If the case concerns serious errors and omissions or serious violations of the Danish Red Cross'

policies, Code of Conduct and other guidelines committed by a Danish Red Cross volunteer, this may cause that the person in question can no longer be involved in the Danish Red Cross' activities.

- If the case concerns serious errors or negligence committed by a business partner, this may have consequences under contract law for the business partner.

You will be informed that we have received your report, as well as when the case processing is completed, unless you have chosen to remain anonymous and have not set up a secure mailbox. You should be aware that, depending on the facts and legal requirements, you may not have access to details or receive information about the outcome of the case.

## **7. Option to remain anonymous**

The whistleblower portal allows you to remain anonymous when submitting a report, as the portal does not require you to disclose your identity. As informant, you are therefore free to choose whether you want to make a report anonymously or provide your personal contact information.

With an anonymous report, you will have the opportunity to choose whether you want to be available for any further case processing by setting up a secure and anonymous mailbox.

It can be difficult to process reports based on information provided anonymously, just as the Danish Red Cross is reluctant to use anonymous information as part of a far-reaching decision, e.g. for one of the employees of the organization. This may mean that a report of illegality etc. might be terminated without it being possible to investigate thoroughly.

If you choose to provide your identity when submitting a report, the Danish Red Cross will, as far as possible, keep your identity confidential in connection with any subsequent investigation of the matter reported. Your personal information will thus only be passed on to third parties if:

- 1) The case processing of the report is carried out by an external auditor, lawyer or similar entity
- 2) The case processing of the report results in a police investigation or a lawsuit
- 3) The law otherwise requires it
- 4) You give your express consent

As stated, your report is initially received by our external partner, Kammeradvokaten, who is authorized to process your information on behalf of the Danish Red Cross in accordance with the data processor agreement we have entered into.

## **8. Protection against reprisals and the like**

Individuals (employees and volunteers) who submit a report using the whistleblower scheme are protected from negative consequences associated with a report, including reprimands, retaliation, change of work duties, change of employee benefits, change of reporting requirements, termination of career opportunities or reputation, threats to do one of the above or deliberate omissions which may harm the informant.

Persons who knowingly and in bad faith make false statements against another person are not protected by the guidelines of the whistleblower scheme. Persons who make a report in bad faith may be subject to civil, criminal and administrative sanctions as well as disciplinary sanctions, including termination of employment or exclusion from the Danish Red Cross.

## **9. What are the rights of the persons to whom the report relates?**

If a report concerns a named person in the Danish Red Cross, the person will be notified. The person shall be informed of what the reported matter relates to, the legal basis for the processing of information, which individuals in the Danish Red Cross are aware of the report and other information that must be provided pursuant to the personal data regulations.

However, in the event that there is a significant risk that such notification will jeopardize the handling of the reported matter or the possibility of obtaining the necessary documentation, the notification may be postponed until the risk no longer exists, in accordance with the personal data regulations.

In the event that the information is incorrect or if the report is openly unfounded, the information will be deleted immediately. If, on the basis of the information collected, a sanction under employment law is implemented against the employee, or if there are other reasons why it is objective and necessary to continue to store information about the employee, the information will be stored in the person's personnel file.

#### **10. Storage and deletion of personal data**

Personal data processed in connection with reports and in accordance with this policy will be stored for as long as is necessary for the processing of the reported matter and additional processing after this.

#### **11. Internal controls and reporting**

The Danish Red Cross' Head of Legal ensures on an ongoing basis that the whistleblower policy is complied with.

The Governing Board receives, at least once a year or more often as needed, an anonymized overview of reports recorded during the year, broken down by number and type, for the purpose of learning, preventing and improving the Danish Red Cross organization.