

HONG KONG RED CROSS

Whistleblowing Policy

Introduction

Hong Kong Red Cross (“HKRC”) is committed to maintaining good governance, emphasizing accountability and high degree of transparency which ensure reliability and trustworthiness of its services. In line with this commitment and social responsibility, and in promoting and supporting a culture of “speaking up” across the Agency, the HKRC expects and encourages its employees and stakeholders (including but not limited to service users, donors, volunteers, suppliers and general public) to report any improprieties.

Purpose

The purpose of this Whistleblowing Policy (the “Policy”) is to set out HKRC’s policy on, and commitment to, whistleblowing and the protection of whistleblowers, and to provide reporting channels and guidance on reporting possible improprieties.

General Policy

“Whistleblowing” refers to a situation where a person (“Whistleblower”) reports concerns about any suspected or actual improprieties relating to HKRC.

Examples of improprieties include, but are not limited to, the followings:

- Criminal offences or breaches of other legal or regulatory requirements;
- Improprieties in financial reporting and/or internal controls;
- Non-disclosure of conflicts of interest;
- Bribery or corruption;
- Serious breaches of fundamental principles of The International Red Cross and Red Crescent Movement;
- Misconduct, malpractice, negligence or unethical behavior;
- Misappropriation of HKRC's assets;
- Putting people’s health and safety at risk; and Deliberate concealment of any of the above.

Protection and Non-Retaliation

HKRC is committed to the fair treatment of all persons making reports in good faith under this Policy, including the protection of relevant persons against unfair dismissal, victimization, unwarranted disciplinary action, refusal of or unfair treatment in services. Reasonable steps will be taken by HKRC to protect the Whistleblower from reprisal or disadvantage as a result of making a report under this Policy.

It is a breach of this Policy for any relevant person to cause disadvantage to a Whistleblower who makes any report under this Policy in good faith. HKRC reserves the right to take appropriate action against any person who initiates or threatens to initiate retaliation against Whistleblowers who make reports under this Policy.

Confidentiality

All information received will be treated in confidence, except where HKRC is required by law or regulation to disclose it, for legal or audit purposes or where HKRC refers the matter to relevant regulators or law enforcement authorities.

HKRC will make every effort to keep the identity of the Whistleblower strictly confidential, unless it is required to be disclosed by legal or statutory requirements.

In order not to jeopardize the investigation, the Whistleblower is also required to keep confidential the fact that a report has been made, the nature of the impropriety concerned and the identities of those involved, unless required to disclose such information by law or regulation.

Making a Report

Although HKRC does not expect the Whistleblower to have full evidence of the impropriety reported, to facilitate the handling of the report and any subsequent investigations, reports made under this Policy should include full details of the followings as far as practicable:

- Name of Whistleblower;
- Contact information (e.g. Tel. No, Email, etc.) of the Whistleblower;
- Details of the concerns (e.g. names of relevant parties, dates, locations, incidents, etc.); and Other relevant supporting evidences if available (e.g. documents, photos, etc.).

The Whistleblower should make their reports in writing to the Hong Kong Red Cross via one of the following channels:

	Method	Details
1	By Email	whistleblowing@redcross.org.hk
2	By Post	In sealed envelope clearly marked with “Confidential” Secretary General (or Chairperson of Council) Hong Kong Red Cross 19 Hoi Ting Road, West Kowloon, Hong Kong

Remarks: If the report involves the Secretary General and/or Deputy Secretary General, such report should be addressed to the Chairperson of Council.

Anonymous Reports

Whistleblowers are strongly encouraged to provide their names and contact details, so that clarification of the reports made or further appropriate information can be obtained directly from them, where required. However, it is recognized that in some cases Whistleblowers may not feel comfortable identifying himself or herself. In these cases, anonymous reports may be submitted. However, please note that anonymous reports can only be handled if the information provided is sufficient to conduct an investigation.

Investigations

HKRC has endeavored to investigate all reports with a mechanism that treats every report seriously and fairly. Independent and professional advices will be sought where appropriate.

If Whistleblower is not anonymous, HKRC will inform the Whistleblower in writing to acknowledge the receipt of the report. Upon the completion of the investigation, the results will also be communicated to the Whistleblower in writing.

False Reports

All reports must be made in good faith. If a Whistleblower makes a false report maliciously or for personal gain, HKRC reserves the right to take appropriate action against that person, including reporting the matter to law enforcement authorities and to recover any loss or damage suffered as a result of the false report. In particular, employees of HKRC may face disciplinary action, including termination of employment where appropriate.

Responsibility for Policy

This policy has been approved by the Council of the HKRC.

April, 2020.