

ECLT Foundation Speak up Policy

TITLE	ECLT Foundation Speak up Policy
CATEGORY	A7 Human Resources
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EXECUTIVE WITH OVERSIGHT	Executive Director
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PURPOSE

At ECLT Foundation we aim at achieving our mission with the highest ethical standards of behaviour and in compliance with any legal or internal regulation.

This ECLT Speak up Policy (the “Policy”) encourages all employees, third parties, partners or beneficiaries to raise in good faith any concerns about any wrongdoing or malpractice on the part of the Foundation while protecting a complainant, who reports in good faith, against exposure, victimisation or retaliation.

SCOPE & APPLICATION

The Policy applies to everyone who carries out work for the Foundation and covers the event of an individual raising a concern about a risk, malpractice or wrongdoing that affects the Foundation, its employees, board members, beneficiaries, suppliers, stakeholders or implementing partners. It aims to offer a consistent, robust and confidential means of raising concerns and to ensure an appropriate response.

Malpractice or wrongdoing includes, but is not limited to:

- Criminal offences, including fraud and financial malpractice
- Infractions of national laws or relevant international standards
- General professional negligence and malpractice, such as immoral, illegal or unethical business conduct
- Abuse of vulnerable persons and more specifically infraction to the Foundation’s Child Safeguarding policy
- Harassment, mobbing, bullying
- Infractions of the Foundation’s Business Code of Conduct
- Infractions against Foundation policies
- Gross misconduct

SAFEGUARDS

Protections for the Whistle-blower and Respondent

The Foundation will not tolerate harassment, retaliation or victimization and will act to protect the whistle-blower when s/he raises a concern in good faith. Every effort will be made to keep the whistle-blower’s identity confidential. In case the Foundation need to disclose the whistle blower’s identity, e.g. if there is an obligation to report externally (e.g. to the police, or to the law courts), or a statement by the whistle-blower may be required as part of evidence, the Foundation will take all reasonable steps to protect the whistle blower from any victimisation and detriment as a result from having made a disclosure.

The whistle blower is requested to keep his/her allegations and the fact, that s/he has made a complaint confidential until completion of the fact-finding investigation. This is to protect the Whistle-blower as well as the respondent.

Anonymous Allegations

Whilst the Foundation encourages whistle-blowers to identify themselves in confidence to facilitate investigation, we will properly investigate anonymous calls, letters or emails.

HOW TO RAISE A CONCERN

Any concern about any wrongdoing can be reported

1. online via dedicated and confidential ECLT Speak Up service by clicking on [this link](#). More information about this service and terms of use are available on ECLT website.
2. Via email at eclt-speakup@eclt.org. This email address is managed by an independent case analyst at Deloitte. who will review the report submitted and transfer it to the authorised ECLT representative taking all essential confidentiality measures and ensuring that no one who has been mentioned in the report receives it.
3. in writing or via phone to ECLT Executive Director, at executive-director@eclt.org, + 41 22 306 14 41 , ECLT Foundation, 7 Rue Francois Versonnex, 1207 Geneva, Switzerland. Please use the report form in Appendix 1.

Concern raisers are not required to but encouraged to disclose their identity as doing so makes looking into the matter easier.

INVESTIGATING PROCEDURE

The Foundation will conduct Investigations neutrally without regard to any person's relationship to the Foundation, position, or length of service. No-one who is under suspicion or target of a complaint can be part of any investigating or decision taking body.

The whistle-blower can inquire as to the status of the investigation. S/he will be informed about the completion of the investigation once the results have been communicated to management.

POSSIBLE OUTCOMES

- Appropriate disciplinary action against the wrongdoer dependant on the results of the investigation.
- No action and case closed if the allegation proves unfounded or non-material.

END.

Revisions

Date	details
May 2020	Section how to report a concern updated with link to reporting platform and dedicated email address.

Last updated: May 2020

Appendix 1: Speak up REPORT FORM

1. What is the issue you wish to report? (Full description) Please describe the incident in as many details as possible
2. Who is involved?
3. Were there any witnesses? If so, who? (Name/Position/How to contact)
4. When did this occur? (Exact Date/Time, Work/After Hours)
5. Where did the incident take place? (Geographic location Premises of which entity, Social Event)
6. Has this occurred before? (Frequency, Period of Time)
7. Have you informed anyone or reported the incident internally, if so how, to whom and when?

8. Your relationship to ECLT (for example: employee; Employee of implementing partner; Consultant /service provider; Supplier or Employee of Supplier etc. Other (please specify))
9. Is there any physical documentation or evidence? (If so, please attach if possible or indicate where/how to find it))
10. If your report concerns misappropriation or theft of ECLT property, please specify where was the item kept prior to removal? (workplace; transit; partner, beneficiary)

Date:

Optional information about the whistle-blower:

Name:

Location:

Phone and/or e-mail: