



International Catholic Migration Commission

WHISTLE-BLOWING POLICY AND PROCEDURE

Approved by the ICMC Governing Committee on 15 November 2021
Revised - 02 February 2024 - adding "staffcomplaints@icmc.net" email address

Policy Title	ICMC Whistle Blowing Policy
In Country Approver	
Approval Date	
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HQ Approver	Robert J Vitillo, Secretary General
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WHISTLE-BLOWING POLICY AND PROCEDURE

1. POLICY STATEMENT AND OBJECTIVES

- 1.1.** As a Catholic-inspired organization working with and on behalf of uprooted and migrant populations including refugees, asylum seekers, internally displaced people, victims of human trafficking and migrants, the International Catholic Migration Commission (ICMC) is committed to hold itself accountable to people and families it assists and specifically aims to prevent misconduct and to safeguard vulnerable populations (cf. The ICMC Code of Conduct). Employees deployed to UNHCR are also bound to the UNHCR Code of Conduct.
- 1.2.** The present whistle-blowing policy intends to uphold the rights of ICMC staff who have significant concerns over any suspected or alleged violations of ICMC or UNHCR Code of Conduct and related policies, such as child safeguarding policy, the PSHEA policy in relation to sexual exploitation, harassment and abuse, financial impropriety, corruption, fraud, and other applicable ICMC policies.
- 1.3.** It is the duty of all ICMC staff to report any breach of the Organization's regulations and rules and to cooperate with duly authorized audits, inspections, investigations and inquiries that may be organized in this respect.

2. DEFINITIONS

Whistle-blowing means a disclosure of information made by one or more ICMC staff or partners who reasonably believe that a violation or breach of an ICMC policy is taking place or has taken place. It mainly concerns:

- a failure to comply with a legal obligation including the breach of a contractual or legal obligation, statutory or administrative requirements, suspected fraud and malpractice.
- a failure to comply with internal ICMC policies and procedures, its Code of Conduct, PSHEA policy, child safeguarding policy, financial regulations or UNHCR Code of Conduct.
- any deliberate concealment of information related to the above-described situations.

3. SCOPE OF APPLICATION

- The policy applies to all ICMC Staff defined, for purposes of this policy, as all permanent and temporary employees, consultants, persons related to governance bodies and/or related to ICMC affiliated offices, subsidiaries and branches, interns, volunteers and all individuals working for or representing ICMC. Its scope of interest includes all of the organizations' actions and decisions.
- The policy is not intended to be used for personal grievances or personal complaints.
- Concerns related to sexual exploitation, harassment and abuse (SHEA), abuse of power and financial impropriety should be submitted through the Whistle-Blowing procedure.
- Disciplinary action will be taken against allegations made maliciously or under false pretences. Such allegations will be regarded as gross misconduct.

4. PROTECTION OF THE WHISTLE-BLOWER AGAINST RETALIATION

- There will be no action taken against a whistle-blower if his/her disclosure is made in good faith, if in other words he/she reasonably believes that allegations made are substantially true and if he/she is not acting for personal gain.
- The procedure will guarantee the non-disclosure of the whistle-blower to avoid possible victimisation or retaliation.
- Any retaliation against the whistle-blower will be investigated and will result in appropriate disciplinary measures.

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5. TO WHOM A WHISTLE-BLOWING MESSAGE SHOULD BE MADE

- Whistle-blowing messages affecting the welfare of ICMC program beneficiaries, other stakeholders or the reputation of ICMC must be reported to the relevant senior manager in ICMC headquarters, field offices, affiliated offices, subsidiary offices or branches, by confidential communication. Such messages can be sent to: staffcomplaints@icmc.net
- ICMC deployed staff to UNHCR will have to report also to UNHCR IGO.
- If, exceptionally, the disclosure is about one of the senior managers, the concern will be reported directly to the Secretary General and/ or to the relevant Department Director.
- If, exceptionally, the disclosure is about the Secretary General, the concern should be reported to the President / the Vice President.
- Concerns related to ICMC Governing Committee Members are reported to the President / the Vice President.
- If, exceptionally, the disclosure is about the President or the Vice President, the concern should be reported to two other members of the Governing Committee.

5.1. STEPS IN THE PROCEDURE

- All whistle-blowing messages will be taken seriously, treated confidentially and actively investigated.
- Anonymous whistle-blowing messages will be accepted but only taken into account and acted upon if sufficient information about the suspected breach is included in the submission.
- All whistle-blowing messages will be acknowledged, and a receipt will be sent on a timely basis. The acknowledgement will confirm reception of the message and inform the recipient that further information and instructions will be provided.
- The whistle-blowing concern will be handled in accordance with ICMC's investigation procedures. ICMC reserves the right to delegate an investigation into alleged misconduct to a third party and outside experts.
- Whistle-blowing messages received by senior managers regarding sexual misconduct and abuse as identified in the PSHEA policy need to be shared with the Secretary General, without disclosing confidential or identifying details such as names, exact locations, etc. The shared information needs to include the nature of the whistle-blowing concern, the course of action which has been decided upon and the outcome of the procedure.
- In general, the whistle-blower will be informed when the case has been closed. Limited information on outcomes and findings will be shared with the whistle-blower, at the discretion of ICMC and following best practice with regard to confidentiality and data protection.
- If, after the closure of the case, the whistle-blower believes the concern has not been satisfactorily settled, s/he may choose to inform the Secretary General or inform the President / Vice President if it concerns the Secretary General.

6. EVALUATION OF THE POLICY

This policy will be evaluated when and as necessary. The ICMC Governing Committee maintains its right to amend the policy and its procedures as deemed necessary.