Caritas Jerusalem Whistleblower Protection Policy

Caritas Jerusalem requires board members, managers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

As employees and representatives of Caritas Jerusalem, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Objective

The objective of this policy is to:

- Provide a safe and confidential means for colleagues to report, even if it is just a doubt or concern
- Protect individuals who reported in good faith about the facts
- Ensure trust and effective communication and transparency within Caritas Jerusalem

Reporting Responsibility

This Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Caritas Jerusalem can address and correct inappropriate conduct and actions. It is the responsibility of all board members, managers, employees and volunteers to report concerns about violations of Caritas Jerusalem’s Code of Conduct or suspected violations of law or regulations that govern Caritas Jerusalem’s operations. Failure to report may put the survivor and Caritas Jerusalem at risk and violate Caritas Jerusalem’s Code of Conduct and/or Safeguarding Policy.

No Retaliation

It is contrary to the values of Caritas Jerusalem for anyone to retaliate against any board member, manager, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Caritas Jerusalem. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Process

Caritas Jerusalem has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If it is a sensitive concern or a complaint about suspected ethical or legal violations, employees are also required to report directly through one of Caritas Jerusalem’s internal reporting channels, which are:

1. Contacting the Caritas Jerusalem Secretary General (In person or by phone)
2. Contacting a Caritas Jerusalem Safeguarding Focal Point (In person or by phone) *Note: The Safeguarding Focal Point role is described in greater detail below.
3. Online complaints form (This form can be filled and submitted anonymously, if the complainant prefers)
If you prefer to use an external reporting channel, either because you do not feel comfortable filing the complaint through the internal reporting channels, or if you resort through these channels but you are not satisfied with the result, you can also contact the Caritas Internationalis Complaint Handling Officer by e-mail: cho@caritas.va

When Caritas Internationalis receives a complaint from Caritas Jerusalem, it will coordinate directly with the Secretary General. If the Secretary General is implicated in the complaint, coordination with the President and the Board of Directors from Caritas Jerusalem will take place. In the end, the course of action will always be with Caritas Jerusalem because it remains the primary decision maker.

Safeguarding Focal Point

The Safeguarding Focal Point can receive complaints if the complainant chooses to report their complaint directly to them. Once the Focal Point receives a complaint, they will document it and refer it directly to the Secretary General (or directly to the Caritas Jerusalem President if the Secretary General is implicated). If needed, and at the discretion of the Secretary General (or President), the Safeguarding Focal Point will also assist in the handling and investigating of a complaint. This could include assisting in the initial assessment of the complaint to determine its credibility, supporting the investigation process, and/or making recommendations to senior management in terms of possible actions. That said, focal points cannot take any final decisions about the way in which a complaint will be handled, nor the actions that will be taken by the organization at the closing of an investigation.

In addition to their involvement in the receipt and handling of complaints, the Focal Point plays an important role in ensuring (1) the implementation and effectiveness of Caritas Jerusalem’s safeguarding measures, and (2) that all employees are sufficiently familiar with the appropriate behaviour and reporting responsibility as reflected in the Safeguarding Policy and Code of Conduct.

Acting in good faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or potential violations must be submitted confidentially by the complainant and the reports of these breaches will be kept confidentially and consistently if further investigation is required.
How to deal with the violations provided

The Secretary General (or the President if the Secretary General is implicated) will notify the person who submitted the complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The exact process of dealing with complaints is detailed in Caritas Jerusalem’s Complaints Handling Procedures.

Approved by the President of Caritas Jerusalem, His Beatitude Patriarch Pierbattista Pizzaballa
The Latin Patriarch of Jerusalem

[Signature]
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