

**POLICY NAME:** Whistleblower Policy  
**APPROVED BY:** CPAC  
**POLICY OWNER:** Co-Directors, HR  
**CATEGORY:** Systems

**APPROVED:** July 2009  
**REVISION APPROVED:** June 3, 2019  
**NEXT REVIEW:** June 2022

## 1. INTRODUCTION

World Renew's tagline is based on Micah 6:8 and captures the overriding values and motivations for our work: "Doing justice, loving mercy and serving Christ" in all we do. World Renew embraces the value of "People Flourishing" as the way that God desires people to live in beloved community with one another. For people to flourish, we must love God, love others, and love ourselves. As we recognize God's image in every person, we know that whatever we do to each other; we do to God (Matthew 25). God holds us accountable for our actions, and we are called to hold each other accountable, so that all may experience the fullness of life God has promised and intended.

Our value of "People Flourishing" means that "We treat each person equally as an image-bearer of God." In World Renew, we know that our world, and we ourselves, are fallen and broken; and that God works to redeem and renew us and our world. This reality shapes our approach to our work and the policies that we choose to govern our decisions. Ephesians 5:8-11 summarises this perspective: "For you were once darkness, but now you are light in the Lord. Live as children of light (for the fruit of the light consists in all goodness, righteousness and truth) and find out what pleases the Lord. Have nothing to do with the fruitless deeds of darkness, but rather expose them."<sup>1</sup>

This passage in Ephesians demonstrates that we must always seek truth; and when wrongs are committed they must be exposed and addressed rather than covered up. This policy seeks to create an organisational culture that will facilitate the speaking of truth, the exposure of what is wrong, and the establishment of right actions.

A whistleblower is any person who, in good faith, conveys, or is proven to be about to convey, an allegation or any information indicating that something illegal, dishonest, unethical or otherwise improper based on World Renew's policies, is occurring, or has occurred, within World Renew or in a World Renew funded project. In particular, this includes, but is not limited to, any allegations of sexual exploitation, abuse, fraud or corruption. It should be noted that whistleblowers are reporting parties. They are neither investigators nor finders of fact; they do not determine if corrective measures are necessary; and they

<sup>1</sup> Ephesians 5: 8-11, The Bible, New International Version (NIV)

do not determine the appropriate corrective or remedial action that may be warranted.

This policy complements, but does not replace, a number of related policies, including but not limited to, the World Renew Codes of Conduct, the Child Safeguarding Policy, the Code of Conduct Policy, the Safeguarding Vulnerable Adults Policy, the Preventing Sexual Exploitation and Abuse (PSEA) Policy, the Anti-Fraud and Corruption Policy and the Complaints Policy.

## **2. SCOPE**

This policy applies to all the work performed and/or financially supported by World Renew. This includes our activities, processes and conduct of staff and partner staff anywhere in the world.

## **3. PURPOSE**

World Renew is a development and disaster response organisation founded upon Christian values. It is committed to the highest standards of ethical, moral and legal conduct from its directors, employees and volunteers. World Renew's Codes of Conduct, employment agreements and volunteer service agreements espouse Biblical principles for duties and living. This policy is an integral part of maintaining these Standards and supports a zero tolerance stance for sexual exploitation, sexual abuse, fraud and corruption. It seeks to encourage World Renew Staff to report any violations, or suspected violations, while providing clarity on the process and the protection in place for the whistleblower.

## **4. PRINCIPLES**

The key principles that underpin this policy include:

- Responsibility to report
- Good Faith
- Confidentiality
- Non-retaliation

## **5. POLICY**

### **5.1 Responsibility to Report**

It is the responsibility of all directors, officers, volunteers and employees to report all violations, or suspected violations, of World Renew Policies, including, but not limited to, violations of policies related to sexual exploitation and abuse, and fraud and corruption.

### **5.2 Process for Reporting Violations**

Reports of violations should be addressed to the Safeguarding and Complaints Coordinator at World Renew using the following means:

- email: [complaints@worldrenew.net](mailto:complaints@worldrenew.net)
- letters:

If sent by mail, it should be addressed to the Safeguarding and Complaints Coordinator, with “Private and Confidential” clearly indicated, to either the Canadian or American office:

World Renew  
Attn: Safeguarding & Complaints  
Coordinator,  
3475 Mainway,  
STN LCD 1,  
Burlington,  
ON, L7R 3Y8  
CANADA

World Renew  
Attn: Safeguarding & Complaints  
Coordinator,  
1700 28th St SE  
Grand Rapids  
MI, 49508  
USA

More details on World Renew’s policy and procedures related to reporting violations of policies can be found on the World Renew website and in the Complaints Policy and related Complaints Handling and Investigation Guidelines. Due to the serious nature of the types of reports that would be considered ‘whistleblowing’ - every effort should be made to report the violation directly to the Safeguarding and Complaints Coordinator based in the Home Office, rather than the Safeguarding and Complaints Focal Points located in operational areas of World Renew’s programmes.

Any staff member in a leadership position (supervisor, manager, officer, director, etc.) who receives a report of a violation must notify the Safeguarding and Complaints Coordinator immediately.

### **5.3 Non Retaliation**

No director, officer, employee or volunteer who in good faith reports an allegation shall suffer harassment, retaliation or adverse employment consequences. A person who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. A person who retaliates against someone who has reported a violation in good faith may be subject to personal civil or criminal liability.

This whistleblower policy is intended to encourage and enable employees and others to raise serious concerns with World Renew prior to seeking resolution outside the organisation by protecting them from adverse consequences. Any person who feels that they have been the target of retaliation should report the incident for immediate follow-up.

### **5.4 Acting in Good Faith**

Acting in good faith means that the report of a violation has been made with honest intent believing the facts to be true. Though a whistleblower may not have to present proof of their allegations in every situation, they must be able to present reasonable grounds for their complaint. If the report was maliciously made or knowingly false, this will be considered a serious disciplinary offence subject to discipline up to and including termination of employment.

### **5.5 Confidentiality**

To the maximum extent possible, or as otherwise required by law, the Co-Directors shall guarantee confidentiality of the identity of the whistleblower and will protect the whistleblower's identity and person. To the extent permitted by law, information given by a whistleblower will be treated in a confidential manner. World Renew will keep the whistleblower's identity confidential unless (i) such person agrees to be identified, (ii) identification is necessary to allow legal procedures and investigations to be carried out, (iii) the person accused is entitled to information as a matter of legal right; or (iv) as otherwise required by law. In any eventuality, World Renew shall inform the whistleblower prior to revealing his or her identity.

## **5.6 Anonymous Reports**

All reports of violations shall be investigated. However, a successful investigation of a report of violations expressed anonymously shall depend on the credibility of the report and the extent to which the allegation can be confirmed or corroborated by an attributable source.

## **5.7 Investigations**

In line with the Complaints Policy and the supporting Complaints Handling and Investigation Guidelines, reported violations or suspected violations will be acknowledged within five business days of receipt and an estimated time of the investigation will be provided. All such reports will be taken seriously.

A preliminary review will determine whether there are grounds for a more detailed investigation. This evaluation shall be based on information and documentary evidence provided by the whistleblower and shall consider whether the disclosure has been made on the basis of reliable information and in good faith. If it is determined that there is not enough evidence to lead to an investigation the whistleblower will be notified of this conclusion. However, where the preliminary evaluation reveals tangible and credible information that supports the allegation, a full investigation will be initiated. At the start of the investigation the subject of the investigation shall be informed unless such communication would, in the view of the Complaints Handling Committee, interfere with the investigation.

All staff and partner staff are expected to fully cooperate in any investigation. Failure to cooperate shall lead to discipline up to and including termination of employment.

If the investigation discovers wrongdoing, violations, unethical or illegal conduct, then appropriate corrective action will be taken consistent with the severity of the violation. At the conclusion of the investigation the whistleblower will be advised of the final outcome.

## **6. MONITORING AND REVIEW**

This policy will be reviewed every 3 years and revised to incorporate any lessons learned during implementation or significant changes in context.

## 7. KEY TERMS AND DEFINITIONS<sup>2</sup>

*Anonymous report:* A whistleblower submits a report of a violation without revealing their identity.

*Complaints Handling Committee (CHC):* This is established at the Home Office level in support of the work of the Safeguarding and Complaints Coordinator. The Complaints Handling Committee (CHC) is responsible for providing advice supporting the management of, and decisions related to, complaints handling for all complaints received at the Home Office level, including reports of violations from Whistleblowers. The CHC also has responsibility for supporting the management of all investigations into complaints.

*Corruption:* is the offering, giving, soliciting or acceptance of an inducement or reward which may improperly influence the action of any person.

*Fraud:* is an intentional distortion, deceit, trickery, and perversion of truth or breach of confidence, relating to an organisation's financial, material, or human resources, assets, services and/or transactions, generally for the purpose of personal gain or benefit. Fraud is a criminal deception or the use of false representations to gain an unjust advantage.

*Investigation:* a systematic process through which information is gathered that attempts to prove or disprove an allegation(s).

*Partner:* an organisation that World Renew enters into Partnership agreements with to collaborate on a mutually agreed action.

*Sexual abuse:* is actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions. (United Nations Secretary General's Bulletin 2003/13, 9 October 2003; Special Measures for Protection from Sexual Exploitation and Abuse).

*Sexual exploitation:* is defined as any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (United Nations Secretary General Bulletin, 9 October 2003). In these situations, the potential victim believes she/he has no other choice than to comply; this is not consent and it is exploitation. Some examples include, but are not limited to:

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<sup>2</sup> World Renew commits to complying with its applicable statutory and legislative obligations. Accordingly, the specific definitions, terms or concepts used in this policy are for reference purposes only. If necessary, the applicable state, provincial or federal definitions mandated by the appropriate jurisdiction where an employee is employed, will take precedence and/or will supersede the definitions outlined in this policy.

- Humanitarian/development worker demanding (or accepting) sex in exchange for material assistance, favours, or privileges
- Teacher insisting on (or accepting) sex in exchange for passing grade or admission to class
- Refugee leader demanding (or accepting) sex in exchange for favours or privileges
- Security worker insisting on (or accepting) sex in exchange for safe passage
- Driver demanding (or accepting) sex to give a female person a seat in the vehicle

*Violation:* In the context of this policy, a violation is understood to be an act that is illegal, dishonest, unethical or otherwise improper, based on World Renew's policies.

*Whistleblower:* A whistleblower is any person who, in good faith, conveys, or is proven to be about to convey, an allegation or any information indicating that something illegal, dishonest, unethical or otherwise improper based on World Renew's policies, is occurring, or has occurred, within World Renew or in a World Renew funded project. In particular, this includes, but is not limited to, any allegations of sexual exploitation, abuse, fraud or corruption.

*World Renew Staff:* Refers to all World Renew staff, volunteers, consultants, exposure visit participants, contractors and fieldworkers