



**ENSEMBLE,
CONSTRUIRE
UN MONDE JUSTE
ET FRATERNEL**

Alert system of Secours Catholique – Caritas France

➤ Alert system objective:

The alert system is a tool given to each SCCF stakeholder allowing him/her to be involved in the prevention of risks related to non-compliance with the Code of Conduct and Ethics.

The alert system allows to:

- report violations of the SCCF Code of Conduct and Ethics;
- report illegal or fraudulent acts in the accounting, financial, banking fields, or on issues related to the fight against corruption;
- report acts of discrimination, harassment or serious incidents related to non-compliance with legislation on health, hygiene and safety, environmental protection, etc.
- obtain information and advice in case of questions or doubts on the application or interpretation of the rules of the Code of Conduct and of Ethics.

The implementation of the alert system requires a high degree of responsibility on the part of each. This system can only operate on the basis of information provided by good faith.

This alert system does not in any way prevent the right of each individual to apply directly to the judicial authorities.

This system is complementary to the other existing tools within SCCF and does not replace them (rights of alert and withdrawal of employees, professional conflict management, etc.)

➤ Exercise an alert system

Any SCCF stakeholder may exercise this right to report facts relating to any of the areas falling within the scope of the tool.

In particular, is considered as an SCCF stakeholder, for the purpose of this tool, any person who interacts with SCCF: volunteers, employees, consultants, donors, partners, beneficiaries, hosts, and any other stakeholder.

➤ Recipients of the alert

Whenever possible, the claim is sent directly to a person in charge (board member, line or functional manager, referent volunteer, team leader etc.).

When circumstances do not allow the claim to be sent to a person in charge, the matter can be referred to the Conduct and Ethics Committee whose contact details are distributed by all appropriate means. The Conduct and Ethics Committee is composed of 3 People, appointed by the National Office, recognized for their integrity and ability to judge and analyze.

All alerts falling within the scope of the tool, regardless of the recipient of the alert, as well as the action taken, are recorded in a confidential database, in compliance with the data retention rules defined below.

The recipients of the alert are subject to an obligation of strict confidentiality.

The recipients of the alert are responsible for checking the authenticity of the alert, its processing and conducting any necessary investigation.

➤ Protection of the alert transmitter

The actor using this tool can be assured that all precautions are taken to ensure that his or her identity is kept strictly confidential at all stages of the analysis and processing of the claim, unless needed by the investigation.

No sanction measures are taken against a stakeholder having issued in good faith and selflessly an alert contained in the scope of the alert procedure and respecting its conditions.

On the other hand, any alert that is clearly outside the scope of the procedure is not serious in nature and is made in bad faith or constitutes an abusive or slanderous denunciation will be destroyed without delay and its author is informed about it. Sanctions could be taken against him/her if the alert is obviously issued in bad faith or falls within the scope of the slanderous denunciation.

➤ Procedures for referring the alert recipient

All reports must comply with the following procedures:

The report must in principle be sent by marked confidential letter or by secure email to the recipient of the alert. If the report is made by telephone or during an interview, it must then be confirmed in writing.

The facts must be stated in a precise and objective manner.

Any document likely to support the alert must be forwarded to the recipient of the alert.

The author of the alert will receive an acknowledgement of receipt and will be kept

informed of the follow-up of the processing no later than 2 months after receipt of the alert.

Anonymous alerts will also be processed subject to having sufficiently accurate and serious information to process the alert.

➤ Alert processing

Each alert gives rise to a preliminary assessment processed confidentially by the recipient of the alert, or by a member of the Conduct and Ethics Committee when the matter is referred to it, in order to determine, prior to any investigation, whether it falls within the scope of the procedure.

The Conduct and Ethics Committee may send an alert back to the person in charge when it considers that he/she is in a position to handle it. Similarly, the person in charge may refer an alert to a higher level when he/she feels he/she is unable to process it.

The recipient of the alert carries out all necessary investigations and ensures that the data collected are adequate, relevant and not excessive in relation to the purposes for which they are collected.

The recipient of the alert is in charge of issuing the recommendations that he/she deems necessary following his/her findings. Depending on their nature, the recommendations are transmitted to the decision-making bodies that have the capacity to act and put an end to the incriminated acts, locally or nationally.

The recommendations of the Conduct and Ethics Committee, deliberating collectively, are transmitted to the National Office, which decides on any action likely to put an end to the incriminated acts and possibly initiate disciplinary and/or judicial proceedings.

The Conduct and Ethics Committee must be informed on all alerts processed by the People in charge and on any action taken.

➤ Rights of the persons implicated by the alert

At the hearing of the implicated person, his or her point of view on the facts reported shall be verified.

The implicated person may request the assistance of an employee or a volunteer of SCCF, during his hearing with the recipient of the alert.

The recipient of the issue informs the implicated person of the alert aimed at him, as soon as it is recorded, whether or not computerised. The implicated person may access to this content and may request correction or deletion if the data are inaccurate, ambiguous or obsolete. However, this information to the implicated person may be delayed in case precautionary measures are necessary, in particular to prevent the destruction of evidence relating to the alert or to protect the sender of the alert.

➤ Retention of collected data

Alert data will be destroyed, stored or archived in accordance with provisions in force.

Thus, data related to an alert considered as not falling within the scope of the tool are destroyed without delay as soon as they are collected by the Conduct and Ethics Committee.

When disciplinary or judicial proceedings are initiated against the implicated person or the author of an abusive alert, the data related to the alert is kept by the Conduct and Ethics Committee until the end of the procedure.

When the alert does not lead to a disciplinary or judicial proceeding, the data related to the alert will be stored in a secure file, to which a name in the form of a pseudonym will be assigned, until the end of the statutory prescription period related to the events that gave rise to the alert.

To contact the Ethics Committee:

By email : alerte@secours-catholique.org

or

by mail under confidential cover :
Secours Catholique - Caritas France
Comité d'alerte
106 rue du Bac
75 0007 Paris, France