



International  
Confederation  
of Midwives

Strengthening Midwifery Globally

# WHISTLEBLOWING POLICY

25<sup>TH</sup> MARCH 2021

## **POLICY STATEMENT**

ICM is committed to the principles defined in the Dutch Whistleblowers Authority Act 2016 and the EU Whistleblowers Directive 2019, ensuring that any concerns regarding malpractice or wrongdoing will be taken seriously and investigated. A disclosure to ICM will be protected if any person acting on behalf of ICM in any capacity (ie. employees, contractors, consultants, volunteers, Board members, Committee members, Midwives Associations, Congress Management Team, Professional Conference Organisers) has an honest and reasonable suspicion that the malpractice has occurred, is occurring, or is likely to occur. Those who raise concerns reasonably and responsibly will not be penalised in any way, or anyone assisting her/him.

It is the duty of every person acting on behalf of ICM to speak up about genuine concerns in relation to criminal activity, fundraising practices, breach of a legal obligation (including negligence, breach of contract, breach of administrative law), miscarriage of justice, danger to health and safety or the environment, and the cover up of any of these in the workplace. It applies whether or not the information is confidential. ICM encourages concerns to be raised internally but will not penalise any person if disclosure is made publicly.

## **WHO THIS POLICY IS FOR?**

This policy is for people acting on behalf of ICM and for the purposes of this policy only, this is someone who is:

- Employed on a permanent or fixed term contract of employment;
- On secondment to ICM;
- On a temporary contract or employed through an agency to work for ICM;
- An independent consultant working with ICM;
- A volunteer working with or on behalf of ICM;
- Contractors and suppliers of services to ICM;
- Board members
- ICM Congress Management Team
- Professional Conference Organisers working with ICM;
- Midwives Association Members of ICM.

## **GUIDING PRINCIPLES**

To ensure that this policy is adhered to, and to assure all those acting on behalf of ICM that their concern will be taken seriously, ICM will:

- Not allow the person raising the concern to be victimised for doing so;
- Provide the opportunity to disclose suspected wrongdoing anonymously (see accompanying procedure);
- Treat victimisation of whistle blowers as a serious matter that may lead to disciplinary action that may include dismissal;
- Not attempt to conceal evidence of poor or unacceptable practice;
- Take disciplinary action if an employee destroys or conceals evidence of poor or unacceptable practice or misconduct;
- Ensure confidentiality clauses in employment contracts do not restrict, forbid or penalise whistle blowing;
- Consult with other organisations to whom any persons acting on behalf of ICM report malpractice.

If an individual is not satisfied with the response received and any subsequent action taken, they should put their concerns in writing to the ICM President who will arrange any further investigation as she/he thinks appropriate. The President will send a written response to the individual concerned. If the President is the Whistleblower, she/he will follow the Whistleblower procedure and consult with other Board members if any further actions are necessary.

## INDEPENDENT ADVICE AND FURTHER READING

Any person working on behalf of ICM who is based in the Netherlands and who suspects a possible wrongdoing within the organisation can get confidential advice from the Dutch Whistleblowers Authority. The wrongdoing has to involve a public interest and must be based on reasonable suspicion. They can be contacted at [advies@huisvoorklokkenluiders.nl](mailto:advies@huisvoorklokkenluiders.nl)

Further Information can be found website on: <https://www.huisvoorklokkenluiders.nl>

Any person working on behalf of ICM who is based outside of the Netherlands and who suspects a possible wrongdoing within the organisation can get confidential advice from the relevant Whistleblowers Authority in their country.

## REVIEW

This Policy will be reviewed every two years by the Board who will ensure it reflects any changes in best practice and legislation.

## OTHER RELATED DOCUMENTS

- ICM Whistle Blowing Procedure
- ICM Safeguarding Policy
- ICM Disciplinary Procedure

Approved by the Board on 1 April 2021 (by e-vote).

Signature:



Franka Cadée, ICM President