

# INTEGRITY POLICY & PROCEDURE FRAMEWORK

# CONTENTS

1. INTRO.....	3
2. APPLICABILITY.....	4
3. WHAT IS INTEGRITY? .....	5
4. PRINCIPLES .....	6
5. INTEGRITY CYCLE: KEY COMPONENTS TO STRENGTHEN INTEGRITY .....	7
6. RISK ASSESSMENT & MITIGATION .....	8
7. ROLES & RESPONSIBILITIES.....	9
7.1 General .....	9
7.2 Specific .....	10
6. CHAIN RESPONSIBILITY.....	13
7. MONITORING & REPORTING.....	14
8. BUDGETING .....	15
9. DISSEMINATION .....	16
10. RELATED POLICIES, PROCESS DESCRIPTIONS, PROCEDURES AND TOOLS..	17
11. REVISION.....	18
ANNEX 1. TOR INTEGRITY COMMITTEE .....	19
ANNEX 2: TOR CASE COMMITTEES.....	21
ANNEX 3. TOR INTEGRITY FOCAL POINTS .....	22
ANNEX 4. TOR CONFIDENTIAL ADVISORS .....	24

# 1. INTRO

Cordaid's mission is to reduce fragility and people's vulnerability where it is most needed and most difficult: in fragile and conflict-affected settings. We envisage a world where the basics of a life in dignity are available to all. Where the poorest and the excluded can influence the decisions that affect them. Any type of harm or misuse of the resources intended to achieve our mission jeopardizes our efforts to contribute to a world where each person is free to flourish and can live in peace.

Cordaid has the full commitment of the leadership to maintain the highest integrity standards to ensure that in pursuing our mission, Cordaid follows the *Above all, Do No Harm* principle and exercises *Due Diligence*. This means that misconduct cannot be seen as 'collateral damage' of *otherwise* good work, but that the dignity and well-being of people and the integrity of resources are core elements of quality programming. We are particularly committed to ensure that Cordaid is a safe and welcoming workplace for every body, that we treat everyone who comes into contact with Cordaid with respect and dignity, and that we use all powers, authorities, assets, resources, and funds entrusted to us appropriately.

This Integrity Policy & Procedure Framework describes Cordaid's approach to Integrity and guides Cordaid representatives and third parties to the relevant policies and procedures. It outlines the structures and standards in place for the Prevention, Reporting, Response and Learning of Integrity issues, which will allow Cordaid to work towards a stronger culture of integrity, trust, and mutual accountability.

This document provides the 'glue' that connects Cordaid's different policies and procedures related to Integrity:

**1. Code of Conduct**

Defines Cordaid's general standards of behavior.

**2. Safeguarding Policy**

Defines Cordaid's standards to ensure the well-being and safety of everyone who comes into contact with Cordaid, including staff and adult and child beneficiaries.

**3. Fraud Policy**

Defines Cordaid's standards to prevent corruption, asset and cash misappropriation & financial statement fraud, and outlines the related measures for prevention, reporting, case handling and sanctions.

**4. Conflict of Interest Policy**

Describes Conflicts of Interest and outlines the procedure to disclose and resolve conflicts.

**5. Anti-terrorism & anti-money laundering policy**

Defines terrorism and money laundering and outlines measures for prevention, detection, monitoring and reporting.

**6. Integrity Standard Operating Procedures (SOPs)**

Defines the procedures how to report and handle complaints.

This Framework consolidates the *Integrity Management Plan 2018* (known as *Integrity Policy*).

## 2. APPLICABILITY

This framework aims to provide a coherent overview of integrity regulations applicable across all Cordaid offices and subsidiaries. However, due to local legislation or other contextual circumstances, particular policies, procedures, or complaint mechanisms can be localized in coordination with the Integrity Officer, to be approved by the respective Country Director as well as the Integrity Committee.

The policies included in this framework are '24h-policies' – they indicate standards of behaviour that every Cordaid representative should be able to expect leadership, staff and other representatives to adhere to at all times. Upon signing their contract, Cordaid representatives (including staff, interns, volunteers, consultants, and board members) confirm that they have read and understood this framework, that they acknowledge the standards of behaviour laid out in the policies included in this framework, and that they commit to adhere to them.

The framework is built to comply with the Dutch Occupational Health and Safety Act (Arbowet) 2017, House for Whistleblowers Act, GDPR Privacy regulations.

When irregularities occur between Dutch and Country Office national law regarding the application of the Integrity Framework, including disciplinary measures, the more stringent is applied.

## 3. WHAT IS INTEGRITY?

Integrity means ‘doing the right thing’ at all times – regardless of whether someone is watching.

Creating a culture of integrity is not only about seeking out the ‘bad apples’. In fact, complaints handling and disciplinary procedures are only *one* part of integrity work. While perpetrators who *actively* seek out to do harm exist, most misconduct is driven by factors such as societal and gender norms, (financial) stressors and (power) inequalities, opportunities, rationalization and ethical blindness (a psychological phenomenon under which people do not see or recognize their wrongdoings). Thus, while holding those accountable who overstep boundaries of acceptable behaviour, integrity work is just as much about recognizing how everyone in a society and in an organization is conditioned, or influenced, in ways that can be harmful, and learn how to contribute to a healthier organizational culture.

In practice, working with integrity in Cordaid means living our values, ensuring a safe and welcoming workplace for every body, behaving with respect and dignity towards the people we work with, and ensuring that powers, authorities, assets, resources and funds are used appropriately. The policies and procedures in this framework provide guidance on the agreed-upon standards of integer behavior within Cordaid, and how Cordaid representatives are expected to prevent and act on misuse of power or position, interpersonal misconduct, and financial violations.

### **Integrity and Safeguarding**

‘Integrity’, which is the main concept used in the Dutch context, is directly linked to ‘Safeguarding’ – efforts to ensure that our staff, operations and programs do not harm staff, children, young people, adults at risk, or anyone else that comes into contact with Cordaid. ‘Safeguarding’ concerns, including sexual harassment, exploitation and abuse, are core part of our approach to integrity, along with the prevention and response to misuse of power and financial misconduct.

## 4. PRINCIPLES

Across all the Integrity policies and procedures included in this framework, Cordaid is guided by the following principles:

- **Shared commitment:** all Cordaid representatives are responsible to contribute to making Cordaid a safe workplace and a safe place for everyone who comes into contact with Cordaid, where people can speak up without fear, regardless of the authority they are addressing, and where conflicts can be resolved in a constructive way.
- **Survivor-centeredness:** The response to cases of interpersonal misconduct will not only be *centered* around the best interest of the person affected, but will be *led* by the needs and wishes of those affected. This includes the right to withdraw consent if the person affected does not want the organization to pursue an investigation (unless this would expose other people to significant risks). Appropriate support will be offered to those affected.
- **Compassion:** We care for those affected and those witnessing misconduct and understand and acknowledge the difficulties of speaking out about it. Whenever we receive a report, we take it seriously, follow up appropriately, and support the complainant in case of feared retaliation.
- **Confidentiality:** Cordaid will provide means to communicate concerns in confidentiality by different means (phone, e-mail, online and in writing). Information around cases will be handled with utmost care to avoid further harm including stigmatization of those affected. Identifying details of people involved will only be shared on a strict 'need to know' basis or when required by law. Malicious breaches of confidentiality or breaches stemming from gross negligence can constitute misconduct in itself.
- **Transparency:** While always respecting confidentiality, we recognize that transparency about case handling and integrity initiatives is crucial to build trust in our integrity system.
- **Professionalism:** Because of the sensitivity of integrity issues and the risk to unintentionally create further harm, those dealing with integrity will need to be appropriately trained to do fulfil their role ('Do No Harm'). Cases will be dealt with proportionally and ensuring due process.
- **Zero-tolerance for not acting:** Reporting misconduct can be challenging. We acknowledge that, but will not tolerate any behavior that enables misconduct by knowingly 'looking the other way'. Leadership is asked to lead by example. Gross negligence to report, in particular safeguarding concerns involving children or otherwise major misconduct, can lead to disciplinary action.

In addition, we follow Cordaid's Core Values *Trust, Mutual Accountability, Collaboration, and Solution-Oriented*, which are particularly important in relation to integrity issues.

# 5. INTEGRITY CYCLE: KEY COMPONENTS TO STRENGTHEN INTEGRITY

Cordaid's approach to integrity consists of four main components: Prevention, Reporting, Response, and Learning. An Integrity Year Plan is drafted annually to ensure the operationalization of this approach, and to enable ongoing improvement. The following measures are considered key to this approach:



Prevention	Reporting	Response	Learning
<ul style="list-style-type: none"> <li>■ Common Integrity Standards (Policies &amp; Procedures)</li> <li>■ Integrity Structures in Place</li> <li>■ Safe Recruitment Standards</li> <li>■ Factiva / background check for signatories</li> <li>■ Awareness: Basic and Follow-up Integrity Trainings for all Cordaid representatives, communications &amp; visibility materials (on- and offline, for internal and external stakeholders), training of partners</li> <li>■ Gender &amp; Integrity Assessments of all offices</li> <li>■ Risk Analysis and Mitigation</li> <li>■ Integrity Culture:                             <ul style="list-style-type: none"> <li>○ Team discussions around the Code of Conduct and creation of a safe working environment conducive to speaking up and resolving conflicts</li> <li>○ Awareness Sessions on Core Values</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>■ Established Reporting Procedure with accessible and confidential reporting channels for Cordaid representatives and third parties, including beneficiaries.</li> <li>■ Protection from retaliation</li> <li>■ Internal and external support offered to those affected, including support by Confidential Advisors</li> </ul>	<ul style="list-style-type: none"> <li>■ Established Response Procedure</li> <li>■ Thorough documentation</li> <li>■ Trainings for everyone handling cases: Case Managers, internal Investigators, Confidential Advisors, Integrity Committee members</li> <li>■ Regular reporting on Compliance and Complaint Metrics to different stakeholders and publicly through Annual Report</li> </ul>	<ul style="list-style-type: none"> <li>■ Analysis of feedback from workshops and Annual Survey results</li> <li>■ Evaluation of cases, near misses, financial losses, Case Management and trends</li> <li>■ Insights from Gender &amp; Integrity Assessments operationalized via Integrity Action Plans</li> <li>■ Consolidation of learnings into improved integrity management</li> </ul>

## 6. RISK ASSESSMENT & MITIGATION

Key to the prevention and management of integrity cases is the identification and mitigation of threats, including their likelihood & impact.

The assessment and mitigation of risks of potential harm to people or resources takes place at multiple levels. Coordination and information sharing between different levels and offices is advised to share efforts.

Level	How	When	Who
Organizational	Anonymized case metrics	Yearly	Integrity Committee, Supervisory Board, Risk Committee
Global Office and Country Offices	Gender & Integrity Assessment Fraud Risk Assessments	Once	Integrity Committee, Country Director
	Update	Yearly	
Field Office	Gender & Integrity Assessment	Once	Office Manager / Team Leader
	Update	Yearly	
Program	Program Risk Assessment	Program design	Program Manager
Project	Project Risk Assessment Gender Analysis tool	At start of each phase starting from design phase through implementation and evaluation	Project Leader/Owner
Partners	Partner Risk Assessment Action Plan including Memorandum of Understanding how integrity (cases) are managed.	At start of each phase starting from selection phase through implementation	Project Leader
Individual	Job Analysis	Recruitment	HR



# 7. ROLES & RESPONSIBILITIES

## 7.1 General

All Cordaid representatives (incl. staff, volunteers, interns)	
Mandate	<ul style="list-style-type: none"> <li>■ Read and adhere to Cordaid's Integrity Policies</li> <li>■ Participate in integrity trainings</li> <li>■ Be accountable for own actions</li> <li>■ Apply Cordaid's Core Values in everyday work</li> <li>■ Report integrity concerns</li> <li>■ Self-disclose potential Conflicts of Interest and any previous misconduct</li> </ul>
All Managers	
Mandate	<ul style="list-style-type: none"> <li>■ Lead by example by living Cordaid's integrity standards and Core Values</li> <li>■ Ensure that all new employees follow the onboarding tool</li> <li>■ Ensure that integrity measures are implemented within their area of responsibility</li> <li>■ Enable an environment where staff can feel safe to speak out</li> <li>■ Notify the Integrity Officer about any received complaints</li> <li>■ Handle management concerns related to Integrity</li> <li>■ Act as Case Managers where appropriate</li> <li>■ Implement follow-up measures after an investigation</li> </ul>
All Project Leads	
Mandate	<ul style="list-style-type: none"> <li>■ Conduct partner and project risk assessment and put in place mitigation measures including capacity-building.</li> <li>■ Budget for integrity, such as capacity-building or communication materials.</li> <li>■ Communicate Integrity Standards to all stakeholders (including beneficiaries, partners and donors) with the support of the Integrity Officer where required.</li> <li>■ Establish and maintain (or align with existing) community-based complaint mechanisms in line with best practice guidance.</li> <li>■ Notify the Integrity Officer of integrity concerns or allegations that arise in relation to the project or project-related staff (via CD/manager of B- or C-country).</li> </ul>
All Project Owners	
Mandate	<ul style="list-style-type: none"> <li>■ Ensure compliance with integrity-related project responsibilities.</li> </ul>

## 7.2 Specific

Chair of Cordaid's Supervisory Board	
Mandate	<ul style="list-style-type: none"> <li>Oversee integrity management in Cordaid.</li> </ul>

  

Cordaid CEO	
Mandate	<ul style="list-style-type: none"> <li>Overall responsibility over integrity management in Cordaid,</li> <li>Create an enabling environment, including by leading by example, ensuring time and financial capacity allocation for integrity, and by promoting the Integrity Framework as well as integrity initiatives and trainings.</li> </ul>

  

Cordaid CFO	
Mandate	<ul style="list-style-type: none"> <li>Create an enabling environment for integrity with a focus on financial integrity, including by leading by example, supporting adequate time and financial capacity allocation for integrity, and by promoting the Integrity Framework as well as integrity initiatives and trainings.</li> </ul>

  

Cordaid COO	
Mandate	<ul style="list-style-type: none"> <li>Create an enabling environment for integrity with a focus on safe programming, including by leading by example, supporting adequate time and financial capacity allocation for integrity, and by promoting the Integrity Framework as well as integrity initiatives and trainings.</li> </ul>

  

Cordaid Integrity Committee	
Appointed by	CEO
Consists of	Senior management & technical advisors with authority to decide on disciplinary measures.
Mandate	<ul style="list-style-type: none"> <li>Monitor and update relevant integrity policies and procedures for the whole Cordaid,</li> <li>Ensure the implementation of the Integrity Year Plan,</li> <li>Take decisions on disciplinary measures,</li> <li>Oversee case management,</li> <li>Annual reporting on complaint metrics.</li> </ul>

  

Cordaid Case Committees: a) Interpersonal and b) Financial	
Appointed by	Integrity Committee
Consists of	3 internal experts with appropriate gender & country representation: a) Interpersonal: Integrity Officer (Chair), Integrity Focal Points/Gender/SGBV experts b) Financial: Internal Auditor (Chair), financial/audit/compliance experts
Mandate	<ul style="list-style-type: none"> <li>Receive complaints,</li> <li>Assess severity of cases,</li> <li>Delegate cases to supervisor or manage cases themselves,</li> <li>Investigate cases,</li> <li>Make recommendations to Case Managers and the Integrity Committee.</li> </ul>

Cordaid Integrity Officer	
Appointed by	CEO/HR
Mandate	<ul style="list-style-type: none"> <li>■ Advise Cordaid on Integrity matters,</li> <li>■ Develop and improve Cordaid’s integrity policies and procedures,</li> <li>■ Organize integrity trainings on different levels,</li> <li>■ Manage or support integrity cases including fact-finding inquiries and investigations (including the appointment of external investigators),</li> <li>■ Analyze risks and propose mitigation measures,</li> <li>■ Regular reporting on integrity trends and complaint metrics,</li> <li>■ Support organizational and project-related Due Diligence process,</li> <li>■ Raise awareness and strengthening integrity capacity in all Cordaid offices.</li> </ul>

Cordaid Internal Auditor	
Appointed by	CFO/HR
Mandate	<ul style="list-style-type: none"> <li>■ Advise on internal control improvements to prevent error, loss and fraud,</li> <li>■ Discuss fraud, mismanagement risks and losses with the board, external auditor, and the audit committee,</li> <li>■ Organize fraud awareness training for staff</li> <li>■ Organize fraud investigation training for those handling cases</li> <li>■ Lead fraud investigations (including the appointment of external investigators) with relevant line management,</li> <li>■ Review compliance with integrity policies &amp; procedures</li> </ul>

Country Directors	
Mandate	<ul style="list-style-type: none"> <li>■ Overall responsibility of localizing and implementing Integrity Policy &amp; Procedure Framework.</li> <li>■ Main contact person for Integrity at CO level, unless otherwise specified (i.e. Integrity Focal Point).</li> <li>■ Enable the implementation of applicable internal and external trainings.</li> <li>■ Disseminate policies, procedures, and visibility materials.</li> <li>■ Undertake or support Risk Assessments and Mitigations at Country Office Level, create and ensure follow up via an Office Action Plan.</li> <li>■ Ensure that proposals include appropriate budget for integrity.</li> <li>■ Ensure that appropriate community-based complaint mechanisms in projects, linked to Cordaid’s integrity system, are in place and working.</li> <li>■ In consultation with Case Committees: Case Management.</li> <li>■ Ensure that visitors – internal (from other offices) and external (e.g. donors, supporters, journalists) receive within 24 hours of arrival an appropriate briefing on applicable integrity standards and how to file a report if required.</li> </ul>

Regional Integrity Focal Points	
Appointed by	Integrity Committee
Consists of	trained staff with appropriate gender & country representation
Mandate	<ul style="list-style-type: none"> <li>■ Case management</li> <li>■ Safeguarding Investigations</li> <li>■ Support Risk Assessments and Mitigations on different levels as required</li> <li>■ Support awareness raising on integrity matters across the organization.</li> </ul>

Confidential Advisors	
Appointed by	CEO, HR Director, Country Directors
Consists of	at least 2 trained staff per office, at least one of them female. + 1 external
Mandate	<ul style="list-style-type: none"> <li>■ Support staff who experienced or witnessed misconduct</li> <li>■ Support awareness raising on integrity</li> <li>■ Confidential Advisors should, if possible, <i>not</i> be appointed Integrity Focal Points or Case Managers.</li> </ul>

**Other roles:**

Field Office Managers and B- and C-country team leaders also have an active role with regards to integrity. They lead by example and report complaints or suspicions to the Integrity Committee. Field office managers and B- and C-country team leaders are also responsible to enable the implementation of applicable internal and external trainings and the dissemination of policies, procedures, and visibility materials, including the translation into all relevant languages. In field offices, the office manager or team leader is also responsible to ensure that visitors – internal (from other offices) and external (e.g. donors, supporters, journalists) receive within 24 hours of arrival an appropriate briefing on applicable integrity standards and how to file a report if required.

**HR** at all Cordaid offices plays an important role for Integrity in terms of support to Case Management and execution and follow-up of disciplinary measures. In general, however, HR is not primarily responsible for integrity, as people might, albeit needlessly, fear that reporting integrity issues to HR might have repercussions on their contracts.

The **Operational & HR** expert supports Country Directors and the Integrity Officer in the implementation of this Framework.

## 6. CHAIN RESPONSIBILITY

Based on legal, donor, and sector requirements as well as our own moral responsibility, reputational and safety considerations, Cordaid has a chain responsibility towards partner organizations, beneficiaries, suppliers and other third parties.

This means that partners' capacity to prevent, detect, and respond to integrity cases need to be assessed, monitored and if necessary trained as outlined in the [Partner and Alliances Policy](#). Wherever there are gaps on Cordaid's or the partner organization's side, mitigation measures will be put in place. A Memorandum of Understanding in partner contracts will outline how integrity issues will be dealt with – e.g. in terms of responsibilities for case management or financial implications.

## 7. MONITORING & REPORTING

Report	Content	Audience	Reporting Frequency	Owner
Case Registry	Integrity cases are registered in a file to allow for internal oversight and monitoring. To ensure privacy, the file including case details is stored safe from unauthorized access, accidental deletion or alteration.	Integrity Officer, Internal Auditor.  CEO and HR Director upon request. The anonymized Case Registry is accessible to Cordaid's Integrity Committee.	ongoing	Integrity Officer Internal Auditor
KPIs	Efforts to strengthen Integrity are monitored with the following KPIs: 1. % reports received at Integrity Committee followed up. 2. All new staff screened with background check. 3. GO and all CO have at least 1 confidential advisor. 4. Staff report knowing how to report an integrity issue. 5. Staff report feeling comfortable to report an integrity issue. 6. % progress of Roll out of the Code of Conduct & Integrity framework.	Cordaid internal	Annually	Integrity Officer HR Director
Annual Report	For full transparency, Cordaid reports its general complaint metrics in the Annual Report. The information included could be the number of cases or the types of misconduct, but no identifying details (including names) are shared.	Public Supervisory Board	Annually	Integrity Officer
Internal Audit Report	Internal Audit report with case metrics, no identifying details (including names) are shared.	External Auditors	Quarterly	Internal Auditor
Integrity Update	General communication about integrity news, ongoing integrity initiatives, new focus areas.	Cordaid internal	Quarterly	Integrity Officer
Confidential Advisor Reports	Trends and risks. No identifying details (including names) are shared.	CEO, HR Director, Integrity Officer	Yearly	Confidential Advisors
Case Reporting	Reporting about integrity cases according to contracts, on a strict need-to-know basis. No identifying details (including names) are shared.	Donors	Case-by-case basis	Case Manager

### Other

Where necessary for transparency, legal, or compliance reasons, integrity trends and risks might be communicated to staff, authorities, donors, partners, or other relevant stakeholders. This will be done on a carefully considered case-by-case and strict need-to-know basis, and no identifying details will be reported unless required by law.

## 8. BUDGETING

To enable Cordaid to fulfil its chain responsibility and to streamline attention to integrity strengthening efforts into all our work, Cordaid will follow a two-tier approach:

1. Inclusion of costs for integrity in project budgets: capacity building of Cordaid representatives and partner staff, communication materials, community sensitization (e.g. meetings, community counselors), community reporting mechanisms, and support services to those affected,  
AND
2. Appropriate annual dedication of semi-restricted funds to cover prevention, case management, and related integrity costs (i.e. investigations) at GO and CO level.

## 9. DISSEMINATION

This framework will be launched during a Cordaid morning with a remote option to ensure all staff worldwide can follow. It will be shared with all existing and new representatives via email and integrated into face-to-face as well as online trainings. Upon signing their contract, new Cordaid representatives confirm with their signature that they have read and understood this framework, that they acknowledge the standards of behaviour laid out in the policies included in this framework, and that they commit to adhere to them. The Framework will be available on Cordaid's intranet and public websites and can be shared for donor Due Diligences.

The Framework is mentioned in all funding agreements for partner organizations including a link to the full document and linked policies and procedures. Consultants commissioned by Cordaid and suppliers will receive the framework as part of their introduction to Cordaid.

Internal and external visitors will receive an appropriate briefing on integrity standards and reporting channels within 24 hours of arrival.

This document and the included policies and procedures will be made available in French and Dutch. Country Directors and Managers of B- and C-country teams are responsible to facilitate translations into other relevant languages to ensure that the documents are accessible and understandable to all staff and relevant stakeholders.



## 10. RELATED POLICIES, PROCESS DESCRIPTIONS, PROCEDURES AND TOOLS

The policies and procedures included in this framework should be read in connection with the following Cordaid policies, process descriptions, procedures and tools:

### **Policies:**

- [Gender Policy](#)
- [Inclusiveness Policy](#)
- [Safety and Security Policy](#)
- Do No Harm Policy
- [Corporate Responsibility Policy](#)
- Donation policy (in preparation)
- [Procurement policy](#)
- [Partner and Alliances Policy](#)
- [Risk Management Policy](#)

### **Tools:**

- [Partner Risk Assessment](#)
- Fraud Risk Assessment tool (to be developed)
- Gender analysis tool (to be finalized)
- [Work Instruction Factiva check and additional checks \(to be developed\)](#)

### **National and community-based policies and reporting mechanisms:**

- Country Office-specific policies, e.g. South Sudan
- Community-based reporting mechanisms, e.g. in Jeune S3, Afghanistan
- [Humanitarian Aid Feedback and Complaint Mechanism Guidance document](#)

## 11. REVISION

This framework and the included policies and procedures will be revised for necessary updates at least annually, and as soon as relevant updates are available.

Revised Integrity Policies and Procedures are proposed by the Integrity Committee and approved by Cordaid's Board of Directors – where required, pending approval by Cordaid's Works Council as per the Works Councils Act. Monitoring is done by the Integrity Committee.

# ANNEX 1. TOR INTEGRITY COMMITTEE

## General

The Cordaid Integrity Committee is both the oversight mechanism and the 'motor' of integrity for the whole of Cordaid.

## Responsibilities

- Maintain the Integrity Policy & Procedure Framework, including its related policies, up to best practice and update it wherever gaps, pitfalls, or opportunities for improvement are identified.
- Ensure that the Integrity Policy & Procedure Framework is relevant, appropriate, accessible, and applied in the whole of Cordaid.
- Approve and oversee the implementation of the Integrity Year Plan.
- Oversee the quality of case management and advise on mitigation where weaknesses are identified.
- Take decisions on disciplinary measures of cases handled by the Case Committees.
- Analyze trends, identify risks and propose mitigation measures to the BoD.
- Act as 'Integrity Ambassadors' by proactively suggesting, promoting, and supporting integrity initiatives (such as trainings, awareness sessions, etc.) and strategic directions for the whole of Cordaid.
- Report annually the integrity metrics to the Supervisory Board and in the Annual Report.

## Profile

- Solid understanding of power relations (including gender roles and stereotypes) and financial misconduct,
- Strong motivation,
- Long-term commitment,
- Highly reliable,
- Robust institutional knowledge of Cordaid,
- Understanding of the different contexts we work in.

## Confidentiality

Members of the Integrity Committee have access to information whose confidential nature they know or should be strongly aware of. They are obliged to keep this information confidential. Identifying details of a case can only be shared on a strict need-to-know basis, except to the extent that a legal provision requires him/her to make it available.

## Appointment

Members are appointed by the Chair of the Integrity Committee. The appointment is valid during the employment with Cordaid, with the option of premature termination on the request of the member or the Chair of the Integrity Committee. The Integrity Committee must be balanced in terms of gender appropriateness and country representation.

## Training

Members of the Integrity Committee will receive training on integrity management.

## Reporting

Members of the Integrity Committee contribute to the Annual report for the Supervisory Board and the organizational Annual Report. Fraud cases are summarized for the Board of directors, Audit Committee and External Auditors each trimester in the Internal Audit Report. Once enough capacity is available, similar reports will be made for other integrity issues.

## Budget

Hours dedicated on the Cordaid Integrity Committee are written as indirect hours, activity code ACT-041131 Integrity Committee, Cost Center T0170.

**Accountability**

To ensure the quality and effectiveness of the Integrity Committee, and to give members the opportunity to be recognized for their important engagement, the active participation in the Integrity Committee is considered in members' performance appraisal (via input from the Chair of the Integrity Committee).

**Current composition** (as of 14 February 2020)

**a) Integrity Committee**

Standard Integrity Committee	
Chair	Jan Kees den Bakker
Secretary	Wodette Donga
BoD	Kees Zevenbergen
Member CO	Akinyi Walender
Member PU	Geertje van Mensvoort
Member Integrity	Maria Wagner
Member Internal Audit	Hans Hupje

**b) Integrity Crisis Team**

Core Team	Primus	Secundus
Leader	Kees Zevenbergen	Tjerk Wagenaar a.i.
Coordinator	Maria Wagner (Interpersonal) Hans Hupje (Fraud / AML)	Integrity Focal Point Derk Haaksma
Logkeeper	Wodette Donga	Mariette Poublon
Member HR	Jan Kees den Bakker	Petra Keeris
Member PU	(dependent on case)	(dependent on case)
Member Communications	Mickael Franci	Paul van den Berg

## ANNEX 2: TOR CASE COMMITTEES

### General

The Case Committees are the backbone of Cordaid's Case Management system.

### Responsibilities

- Receive reports about (suspected) Integrity breaches,
- Pre-assess and register cases,
- Assign or take up Case Management,
- Investigate or appoint investigators to investigate (suspected) Integrity breaches,
- Make recommendations about disciplinary measures and management observations to the Integrity Committee.
- Contribute to the report of integrity metrics to the Supervisory Board and in the Annual Report.

### Profile

- Strong understanding of power relations (including gender roles and stereotypes) and financial misconduct, respectively,
- Strong motivation,
- Long-term commitment,
- Highly reliable,
- Solid institutional knowledge of Cordaid,
- Understanding of the different contexts we work in.

### Confidentiality

Members of the Case Committees have access to information whose confidential nature they know or should be strongly aware of. They are obliged to keep this information confidential. Identifying details of a case can only be shared on a strict need-to-know basis, except to the extent that a legal provision requires him/her to make it available.

### Appointment

The Case Committees are chaired by the Integrity Officer and the Internal Auditor, respectively. Other members are appointed by the Integrity Committee. The appointment is valid during the employment with Cordaid, with the option of premature termination on the request of Case Committee member or the Chair of the Integrity Committee. Case committees must be balanced in terms of gender appropriateness and country representation.

### Reporting

Members of the Case Committees contribute to the reporting of integrity metrics for the Supervisory Board and the organizational Annual Report.

### Budget

From 2021, hours dedicated on the Case Committees are written as indirect hours.

### Accountability

To ensure the quality and effectiveness of the Case Committees, and to give members the opportunity to be recognized for their important engagement, the active participation in the Case Committees is considered in members' performance appraisal (via input from the Chair of the Case Committee).

### Current composition (as of 14 February 2020)

	Interpersonal Misconduct	Financial Misconduct
Chair	Maria Wagner, Integrity Officer	Hans Hupje, Internal Auditor
Member 1	Integrity Focal Point, Gender Expert, or other suitable profile	Integrity Focal Point, Internal Auditor, or other suitable profile
Member 2	Integrity Focal Point, Gender Expert, or other suitable profile	Integrity Focal Point, Internal Auditor, or other suitable profile

## ANNEX 3. TOR INTEGRITY FOCAL POINTS

### General

Integrity Focal Points are regional specialists to support the implementation and localization of Cordaid's Integrity Framework, to strengthen Case Management capacities, and to conduct investigations.

While national and program Focal Points for Integrity would be strongly recommended, the creation of regional Integrity Focal Points:

- mitigates the fact that building integrity capacity at Country Office level will be a longer-term process that includes further time and financial investment, as well as distinction from the existing Confidential Advisor role<sup>1</sup>.
- strengthens collaboration between Country Offices.
- strengthens regional relevance and ownership of Cordaid's approach to Integrity.
- mitigates the current shortcoming of Case Management capacities.
- reduces the costs of hiring external investigators.
- allows Cordaid representatives across the world to develop professionally in a future-relevant domain. In the long run, Integrity Focal Points will be able to take up additional responsibilities (e.g. advising on and revising Cordaid's Integrity Framework) and to lead on developing a culture of integrity in all we do in the whole of Cordaid.

### Responsibilities

- Receive concerns, suspicions, or allegations of integrity breaches,
- Notify the Integrity Officer and / or Internal Auditor of integrity reports,
- Potentially participate in Case Committees,
- Support other integrity initiatives such as localization of policies & procedures, risk assessments and mitigations on different levels, and awareness raising activities.

### Profile

- Working proficiency of at least English, plus French (for Francophone countries), Persian or Arabic (for Middle East), preferably multi-lingual,
- At least basic understanding of power relations (including gender roles and stereotypes) and financial misconduct,
- Strong motivation,
- Long-term commitment,
- Good self-awareness,
- Strong analytical competences,
- Highly reliable,
- Preferably mid-level,
- Supportive line manager.

Given the sensitivity of certain interpersonal violations and as affirmative action, women are particularly encouraged to become Integrity Focal Points.

### Confidentiality

Integrity Focal Points have access to information whose confidential nature he/she knows or should be strongly aware of. Integrity Focal Points are obliged to keep this information confidential. Identifying details of a case can only be shared on a strict need-to-know basis, except to the extent that a legal provision requires him/her to make it available.

### Appointment

Integrity Focal Points are appointed by the Chair of the Integrity Committee, upon self-nomination or nomination of CDs. Gender appropriateness and country representation must be considered during the appointment. The appointment is valid during the employment with Cordaid, with the option of premature termination on the request of the Integrity Focal Point or the Chair of the Integrity Committee.

<sup>1</sup> The Integrity Focal Point and Confidential Advisor role should not be taken up by the same person, as this might jeopardize employees' trust in the Confidential Advisor (see for example House of Whistleblowers, The Reporting Procedure, p.20).

**Training**

Integrity Focal Points will receive general training to fulfil their function, as well as safeguarding investigations training. Where required during the initial phase, the Integrity Officer provides on the job coaching/guidance.

**Reporting**

Integrity Focal Points report content-wise, but not hierarchically, to the Integrity Officer. The line manager remains the sole manager of the staff member. In case of conflicting time commitments, the Cordaid Integrity Committee can request the Integrity Focal Points to be freed up fully or partially for the duration of a particular assignment.

**Budget**

From 2021, hours dedicated on the role of Integrity Focal Point are written as indirect hours.

**Accountability**

To ensure the quality and effectiveness of the Integrity Focal Points, and to give members the opportunity to be recognized for their important engagement, the activity as Integrity Focal Point is considered in Focal Points' performance appraisal (via input from the Integrity Officer).

**Current composition** (as of 27/02/2020)

Region	Integrity Focal Point
Ethiopia, Kenya, Nigeria, Sierra Leone, South Sudan, Uganda, Zimbabwe	To be appointed
Burundi, Cameroon, CAR, DRC	To be appointed
Afghanistan, Iraq, Myanmar, Philippines, Syria	To be appointed

# ANNEX 4. TOR CONFIDENTIAL ADVISORS

## General

Confidential Advisors make the safety and support net to assist and advise Cordaid representatives who have witnessed or been affected by interpersonal, financial, or any other misconduct

## The confidential advisor's duties

Confidential Advisors:

- are a point of contact in case of suspicions of or complaints about interpersonal misconduct or any other (potential) integrity breach. They are responsible for the initial assistance of persons who are confronted with this, and offer support and advice relevant to the situation;
- provide information about the procedures which can be followed, both the internal reporting procedure and criminal or civil proceedings, and their consequences;
- where necessary, make a referral to professional support services (for example, to a support agency. The advisor provides support in involving these agencies) or to authorities, such as
- the police and public prosecutor;
- analyse the reported integrity incidents, and use this analysis to advise the Management Board on the policies and measures to be taken, without disclosing identifying details of particular cases;
- support complainants in seeking resolutions, provide support and advice and help to determine whether it is possible to reach a resolution informally;
- advise on and support the complainant in reporting integrity matters to the organization; e.g. at the request of the complainant, put the complaint in writing or support the complainant to do this, and send this written complaint to the Integrity Officer;
- provide information about the role of confidential advisor and about the reporting procedure to follow;
- personally, keep a confidential archive of processed complaints;
- propose measures in the short term to improve the complainant's situation;
- in exceptional cases, report the complaint to the competent authority if the confidential advisor is of the opinion that the content of the complaint warrants this (e.g. in case of mandatory reporting in child abuse cases);
- provide emotional and, if possible, psychological support to the complainant when formalizing the complaint or dealing with the case committee, and/or assist and represent the complainant during a complaints procedure;
- are responsible for the complainant's follow-up care and to help prevent retaliation against the complainant;
- suggest potential solutions to enable the establishment or amendment of policies surrounding integrity issues;
- contribute to the evaluation of his/her assigned duties, the reporting procedure and the way the Case and Integrity Committees carry out their duties;
- stay up to date on (national) developments in preventing and tackling integrity issues.

## Profile

A confidential advisor must enjoy the confidence of staff members, be comfortable in the culture of the organization, be accepted, be respected and maintain good contacts at all levels of the organization. A confidential advisor is empathetic, possesses the skills to structure discussions, takes complaints seriously, offers emotional support, understands victims' potential reactions and is familiar with the emotional consequences of certain forms of undesirable behaviour for victims. A confidential advisor is familiar with referral options and with the potential consequences of a complaint, both legal consequences and consequences relating to legal status. The confidential advisor is also able to withstand pressure placed on confidentiality.

## Confidentiality

The confidential advisor has access to information whose confidential nature he/she knows or should be reasonably aware of. The confidential advisor is obliged to keep this information confidential, except to the extent that a legal provision requires him/her to make it available or when his/her duties relating to the implementation of this policy make it necessary to make it available.



## Facilities

To enable them to fulfil their duties, confidential advisors will participate in an induction session (via Skype) within three months of being appointed, and will participate in a full training within – ideally – six months of being appointed. Where necessary, a space will be provided where confidential discussions may take place.

## Appointment

A confidential advisor is appointed by the Executive Director in GO, and by CDs in COs. A confidential advisor is appointed following an election (to ensure trust of colleagues), for the time of employment with Cordaid, with the option of premature termination on the request of the member or the Chair of the Integrity Committee.

Because a confidential advisor should be easily accessible for employees, it is recommended that several confidential advisors be appointed. It is an official position, as it is in the organization's interest to take preventing and tackling undesirable behaviour seriously. A confidential advisor is not accountable to his/her own supervisor or manager, but to the Management Board.

## Reporting

The Confidential Advisors in each country submit a written report, at least once a year, to the Board of Directors in The Hague, containing the total number of complaints, the nature of the complaints received and any trends observed, without disclosing any identifying details. In the first year of implementation (annual reports for 2020), the Country Office Confidential Advisor reports will be supported and reviewed by the Integrity Officer. The Board sends the reports to HR and the GO Works Council.

## Current composition (as of 13 August 2020)

### Confidential Advisors

Office	Name	Office	Name
Afghanistan	<a href="#">Angela Mehri</a>	Ethiopia	<a href="#">Rebeca Dimitri</a>
	<a href="#">Freshta Raoufi</a>		<a href="#">Samuel Tenna</a>
	<a href="#">Anwar Alvi</a>	Iraq	<a href="#">Hamsat Canoon</a>
	<a href="#">Hamid Nikzad</a>		<a href="#">Ammar Qassar</a>
Burundi	<a href="#">Thérèse Ntahompagaze</a>	Myanmar	<a href="#">Nau Htoo</a>
	<a href="#">Vincent Kamenyero</a>	Netherlands	<a href="#">Hilda van 't Riet</a>
CAR	<a href="#">Gustave Tshimbalanga</a>		<a href="#">Matthias van Halem</a>
	<a href="#">Annie Flore Baliguini</a>	Sierra Leone	<a href="#">Matilda Songo-Browne</a>
DRC	<a href="#">Marie Jeanne Ngombe</a>		<a href="#">Lorisa Canillas</a>
	<a href="#">Gabriel Ngouma</a>	South Sudan	<a href="#">Cissy Nalusiba</a>
	<a href="#">Rachel Zawadi</a>	Uganda	<a href="#">Rachel Kyoziira</a>

External Confidential Advisor: [Marzieh Dadvar](#), +31 647 01 09 09

## ABOUT CORDAID

Cordaid works to end poverty and exclusion. We do this in the world's most fragile and conflict-affected areas as well as in the Netherlands. We engage communities to rebuild trust and resilience and increase people's self-reliance.

Our professionals provide humanitarian assistance and create opportunities to improve security, health care and education and stimulate inclusive economic growth. We are supported by nearly 300,000 private donors in the Netherlands and by a worldwide partner network. Cordaid is a founding member of Caritas Internationalis and CIDSE.

## CONTACT

**Maria Wagner**  
Integrity Officer  
[mwg@cordaid.org](mailto:mwg@cordaid.org)

**Postal address**  
PO Box 16640  
2500 BK The Hague  
The Netherlands

**Address**  
Grote Marktstraat 45  
2511 BH The Hague

+31(0)70-31 36 300  
[info@cordaid.org](mailto:info@cordaid.org)  
[www.cordaid.org](http://www.cordaid.org)

**CARE.  
ACT.  
SHARE.  
LIKE CORDAID.**

---