



Integrity

Standard Operating Procedures

Reporting and Handling suspected breaches

The Integrity Standard Operating Procedures are integral part of Cordaid/ICCO's Integrity Policy & Procedure Framework, in which applicable principles, roles & responsibilities, and related documents are outlined.

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1. Intro

These Integrity SOPs describes the Standard Operating Procedures for reporting and handling suspected integrity breaches.

It consolidates the *Whistleblower Regulations*, the Case Handling procedure laid out in the *Policy regarding (Un)desirable Behavior*, and the *Handling Irregularities and/or Integrity Violations* document.

2. Scope

This procedure applies when the alleged perpetrator of misconduct is a representative of Cordaid/ICCO and Cordaid/ICCO subsidiaries, including members of the Supervisory Board, directors, staff, consultants, volunteers and interns. It also applies when Cordaid/ICCO and a partner organization have agreed that this procedure would be followed when integrity concerns arise in a joint project.

3. Reporting Integrity Concerns

When it comes to Integrity, staff and anyone who comes into contact with Cordaid/ICCO is encouraged to report any suspicion or concern about our representatives' behavior.

What to Report?

Any concerns, suspicions, or allegations of integrity breaches, as outlined in the Cordaid or ICCO Code of Conduct and policies related to Safeguarding, Fraud, Conflict of Interest, Anti-Terrorism and Anti-Money Laundering can be reported.¹

Why Report?

Allegations of integrity issues should be reported to the organization for two key reasons:

1. For any person affected to receive support and to put a stop to the misconduct,
2. To hold Cordaid/ICCO accountable and to help Cordaid/ICCO identify and manage risks and trends, which can be used to strengthen the culture of integrity within the organization, e.g. by dismissing staff that doesn't respect Cordaid/ICCO's integrity standards.

Who can Report?

Anyone can report concerns or allegations about the behavior or Cordaid/ICCO representatives or someone linked to Cordaid/ICCO. This means that staff, consultants, volunteers, or interns can report, but also third parties like beneficiaries or staff of partner organizations.

Anonymous reports can be made via the online reporting form. Cordaid/ICCO will treat anonymous reports as any other report as long as sufficient information is available to process the complaint. Please also see Cordaid/ICCO's commitment to Confidentiality, [Protection of complainants and others involved](#), and [Support to those affected](#).

¹ Where complaints relate *exclusively* to disagreements or conflicts regarding labor rights, such as contracting, benefits or performance appraisal, the complaint procedure laid out in the [Legal Status Regulations](#) or local HR Manuals applies. Where complaints or incidents relate *exclusively* to security, the [security incident reporting procedure](#) applies.

How to Report?

To make a report about an integrity issue, you have different options:

1. Report online via www.cordaid.org/en/reporting-integrity-concerns-and-security-incidents/
2. Speak to any of the following persons, whomever you feel most comfortable with:
 - Your immediate or higher supervisor,
 - The Integrity Officer via integrity@cordaid.org, or Integrity Focal Point
 - The HR Director via integrity.committee@cordaid.org or +31 (0) 70 31 36 685.
3. You can reach out to the external Whistleblower Service via +31 (0)88 1331 030, via email to advies@huisvoorklokkenluiders.nl, or directly [online](#) (Dutch). To report (suspected) misconduct via the House of Whistleblowers, the wrongdoing must be of public interest and as well as based on reasonable suspicions.
4. Make use of [ACT Alliance](#) or [Caritas Internationalis](#) reporting mechanisms.

Note: Do not try to investigate the issue yourself. Your only responsibility is to report the concern or allegation, from there it is the responsibility of the Case Committee to deal appropriately with the concern.

The Role of Confidential Advisors

Country/Cluster Offices and the Global Office in The Hague all have Confidential Advisors, a 'person of trust'. Cordaid/ICCO also has an external Confidential Advisor who is not an employee of Cordaid/ICCO. Cordaid/ICCO representatives can find names and contact details of all Confidential Advisors on the [Integrity page](#) on SharePoint (internal).

Confidential Advisors are there to listen and support Cordaid/ICCO representatives. Together you can explore whether and what action you can take when you experience or witness misconduct – the decision remains with you. Conversations will be treated confidentially. For more details on the role of Confidential Advisors, check [Sharepoint](#) (internal).

4. Protection of complainants and others involved

Protection from Retaliation

Cordaid/ICCO considers complaints as vital signals that help the organization fulfil its *Duty of Care* and ensure that we *Do No Harm*. We do not tolerate any type of retaliation against complainants, people affected, witnesses, those tasked with handling a case or those supporting the person affected. This includes, but is not limited to dismissal or other unilateral contractual changes, transfers of location or duties, inhibiting professional chances, not granting or imposing benefits (e.g. sick leave, leave days), aggression and violence, bullying, ignoring, excluding, making unfounded or disproportionate criticism about the complainant and their performance, intimidating or threatening the complainant, or equivalent, *because* of the complaint.

When you fear or experience retaliation or breaches of confidentiality, please include this in the initial complaint or reach out to the Manager of your case, the Integrity Officer, or a Security Advisor (if you fear for your safety). On a case-by-case basis, suitable measures will be put in place to ensure your protection. If the retaliatory behavior amounts to such, it will be considered misconduct in itself.

Data Safety

To help protect the confidentiality of integrity issues and the privacy of those involved, the following will apply for emails and documents containing sensitive information:

- Wherever identifying details (e.g. names, job title, etc.) are included: mark subject of the email/name of the document as 'Confidential' or 'Strictly Confidential'. In documents, add 'Confidential' or 'Strictly Confidential' in the header and add a Watermark 'Confidential'.
- Wherever sensitive, but not directly identifying details are included (e.g. Gender & Integrity Assessments): mark subject of the email/name of the document as 'Restricted'.
- Do not mention identifying details in the subject/title of emails/documents.
- Do not share any data with people who are not involved in the response to a case ('need-to-know rule'), e.g. do not share the original complaint with the Subject of Complaint.
- Ensure that emails, folders, documents and notes can only be accessed by those authorized, and password-restrict the access wherever possible.

5. Support to those affected

People affected by misconduct or retaliation might need access to different psychosocial, medical, legal, or security-related services. The Case Manager is in general responsible for overseeing and facilitating the required services, if applicable with the support of the Confidential Advisor, the Integrity Focal Point or the Integrity Officer. The services can be offered either internally or externally, depending on capacity and taking into account the preference of the person affected. Support services are to be paid by the integrity budget of the respective country/cluster office. In exceptional cases, financial support by GO can be requested. Requests will be assessed on a case-by-case basis.

A Mapping of available support services per Country Office is available on [Sharepoint](#).

6. Handling of Integrity Concerns or Allegations

Any person who receives a concern or allegation of misconduct of a Cordaid/ICCO representative – usually a manager, Integrity Focal Point or Integrity Officer – is responsible to provide 'First Aid' and to ensure that the complaint is followed up appropriately. In case of *acute* security risks, please follow the security incident reporting.

A flowchart and RACI-Table illustrating the Case Handling process can be found in Annexes 2 and 3. Please note that the time indications for each step are indicative.

Step 1: Receipt of the complaint 24 hrs

- If in a conversation: ask key questions (what, when, where, who witnessed, etc.), but do *not* investigate or judge the situation. In case of potentially traumatic incidents (e.g. following sexualized violence), do not ask for details.
- In case of *acute* psychosocial, medical, legal, or security needs that cannot wait, make sure that these needs are met (e.g. going to hospital, police, safe place, etc.). Note that in case of serious sexualized violence, such as rape, those affected need to be able to access medical emergency care within 72hrs of the incident. See also Cordaid/ICCO's [Safety First Policy](#) for guidance on acute incidents. Only involve people who *need* to know to help with the response.
- In case of serious incidents (e.g. child abuse), make a first verbal report to the Integrity Officer or HR Director as soon as possible.
- Fill in the reporting form [online](#) or use the form in Annex 1 and send it to integrity@cordaid.org within 24 hours of receiving the complaint.

- If the report was done in writing: acknowledge receipt of the complaint and state that the complaint will be followed up in line with Cordaid/ICCO's policies and procedures.

Step 2: Pre-assessment and registration of the complaint 48 hrs

In case of interpersonal misconduct: The Integrity Officer, in consultation with the Interpersonal Case Committee, assesses the admissibility and severity of the complaint.

In case of financial misconduct: The Integrity Officer informs the Internal Auditor who, in consultation with the Financial Case Committee, assesses the admissibility and severity of the complaint.

Admissibility

- Is the complaint about the behavior of a Cordaid/ICCO representative or someone linked to Cordaid/ICCO?
- Is the complaint about an Integrity issue that falls under the authority of Cordaid/ICCO's integrity system?
- Is there enough information to deal with the complaint?
- Is there already an inquiry or investigation taking place by another organization/body?

Severity

- Does the complaint involve actual or potential harm to people, resources, or funds?
- Is the alleged Subject of Complaint a person in a position of power (director, manager)?

If the criteria for admissibility and severity are not sufficiently met, the Case Committees will either seek for additional information from the complainant, forward the complaint to those responsible (e.g. Police, Security Advisor or Integrity Officer of partner organization, or line manager of the accused in cases of management concerns), or refer the issue back to the complainant with an explanation.

Registration

The Integrity Officer or Internal Auditor registers the case, opens a case file including the Report Form which will notify the Integrity Committee that a complaint was received. No identifying details will be shared with the Integrity Committee.

Step 3: Identification of Case Manager 48 hrs

Based on the pre-assessment of the case, the Case Committee will assign a Case Manager. Where the supervisor of the alleged perpetrator is not involved in the allegation, she or he will in general take up the role of Case Manager and will oversee any inquiries or investigations.

However, Case Management will be taken up by a member of the Case Committee in either of the following cases:

- a) The supervisor is not adequately prepared (trained and/or experienced) to handle the case,
- b) The supervisor is in any way – directly or indirectly – implicated in the allegation,
- c) The case involves sexual abuse or exploitation,
- d) The case involves minors (below 18 years of age),
- e) The alleged perpetrator is the Country/Cluster Director,
- f) Otherwise exceptional case.

Step 4: Case Management *ongoing*

- **Risk assessment:** The Case Manager conducts a risk assessment (at various levels: safety of the survivor and anyone involved; legal, security, donor and media risks; risks for the project management and implementation) and, in appropriate consultation with the Case Committee, decides/implements measures to mitigate those risks.
- **Support:** The Case Manager ensures that appropriate support services are offered to those affected. This could include psychosocial, medical, legal, or security support services, provided internally (e.g. by Confidential Advisors, Security Advisors) or by external professionals.
- **Activities:** If required, the Case Manager conducts or facilitates a fact-finding preliminary investigation, as long as it does not jeopardize any future investigations. This could include a conversation with the complainant or desk research, without raising profile or informing the alleged perpetrator of the complaint. The Case Manager assesses whether a full-fledged investigation is necessary and appropriate.
- **Investigation:** If an investigation is launched, the Case Manager, in consultation with the Integrity Committee, drafts the ToR (see Annex 5 Investigation Terms of Reference Template) and the Investigation Plan, and appoints the investigation team, usually comprised of 2 investigators. At least the lead investigator *must* be trained and experienced in conducting integrity investigations in the given domain (i.e. safeguarding, fraud), given the particular complexity and sensitivity of integrity issues.
- **Reporting:** The Case Manager is responsible to notify relevant stakeholders, like local authorities or donors. No identifying details will be shared (unless required by law, for instance in the case of child abuse).
- **Documentation:** The Case Manager is responsible to log all key steps taken, including calls, emails, meetings, investigations, etc. The Case Manager is also responsible to keep the Case Registry updated.

Step 5: Investigation *1 month (ideally)*

- An internal administrative investigation does not replace criminal proceedings, but is Cordaid/ICCO's way of ensuring our Duty of Care. For safeguarding investigation guidelines, see also [CHS Guidelines for Investigations](#).
- The Investigation Team, as part of their contract, signs a Confidentiality Agreement [see Annex 4].
- The Investigation Team, in consultation with the Case Manager, revises and adjusts the Investigation Plan if necessary. The Investigation Plan, at a minimum, includes the documentation and materials to be revised, a list of interviewees, and an investigation timeline to determine the substantiation of the allegation.
- The Subject of Complaint is put on administrative leave for the time of the investigation, unless the risks of doing so (e.g. security risks) are higher than the risk of not putting the SoC on leave.
- The Case Manager, the Country/Cluster Director/Team Leader (if not Case Manager) and, if applicable, a local contact person, are responsible to support the Investigation Team with regards to logistics, accommodation, access to documents and contact to interviewees.
- The Investigation team gathers evidence around the allegation(s) and produces an investigation report including a conclusion on the substantiation of the allegation(s), recommendations, and, if applicable, management observations. The report is shared with the Case Manager and the Integrity Committee.
- The substantiation of allegation(s) will be assessed on the basis of evidence that the allegation(s) can be reasonably believed to be upheld.

Step 6: Follow-up 1 week

- Based on the investigation report, the Case Manager and the Case Committee make recommendations to the Integrity Committee about disciplinary measures (if any) and, if applicable, organizational improvement measures.
- Based on the recommendations, the Integrity Committee decides on follow-up measures such as disciplinary or organizational improvement measures.
- The Case Manager is responsible to coordinate the agreed-upon follow-up measures, usually with a Follow-up plan including the implementation of organizational improvement measures and, if applicable, ongoing support provided to the person affected.
- The HR director/HR manager in COs are responsible to implement disciplinary measures decided upon by the Integrity Committee, if applicable via the Subject of Complaint's Line Manager. If the allegation(s) were substantiated, a disciplinary hearing is organized, and the case is registered in the Subject of Complaint's personnel records. If the allegation(s) were not substantiated, no data should be stored on the Subject of Complaint's personnel records.
- The Case Manager and, if applicable, the local contact person, is responsible to inform the Subject of Complaint about the result of the investigation and the disciplinary action.
- If the allegation seems to amount to a crime in the country where the case happened, it wasn't reported earlier, and the person affected (if 18+) consents, the case file will by default be handed over to local authorities.
- Where Cordaid/ICCO has suffered a financial loss, full restitution will be sought of any benefit or advantage obtained and the recovery of costs will be sought from the individual or organization responsible for the loss. If the individual or organization can not or will not compensate for the loss, Cordaid/ICCO considers taking legal action to recover the loss.
- The Case Manager and, if applicable, the local contact person, is responsible to ensure appropriate follow-up communication with the person affected, e.g. information about the outcome of the investigation.
- The Case Manager is responsible to archive all case documents in a safe way, ensuring that only authorized staff can access the case files.
- Upon implementation of all follow-up measures, the Case Manager, in consultation with the Integrity Committee, closes the case in the Case Registry and informs the person affected as well as the complainant (if different from the person affected). The level of information shared with the person affected or complainant will be appropriate with regards to the privacy rights of the SoC as well as the right to justice of the person affected. A complainant who is not the person affected might only be informed that the complaint was followed up, and that appropriate measures have been taken, without providing further details. If a SoC resigns during an investigation, this will be noted on their personnel records, and indicated when a potential future employer requests a professional reference.

Special cases

Children: If a child is affected by the alleged misconduct, the persons involved in handling the case, in particular the Case Manager and investigators, must be able to ensure that the response is done in a child-friendly way, and that appropriate support services are made available wherever necessary. The parents/caretakers, unless implicated in the alleged misconduct, must be informed in an appropriate way.

High Risk: If a case holds extraordinary risks to the persons involved including well-being, reputation, or other risks other than security, the CEO will call on the integrity crisis team consisting of different experts who will be freed up to support the crisis.

Implication/Conflict of Interest: If a person responsible for the response to a case is implicated in the case or has a Conflict of Interest, the tasks are taken up by a person/body in a higher position. For example, if the Integrity Officer is implicated, the case will be managed by the Integrity Committee. If a member of the Board of Directors is implicated, the case will be managed by the chair of the Supervisory Board.

Management Concerns: Issues that are brought forward as integrity complaints that are not clearly definable as per Cordaid/ICCO's integrity policies, but still present potential integrity risks (for instance by creating an unsafe working environment), are defined as 'management concerns' and will be referred to the line manager of the Subject of Complaint for follow-up.

Particularities: This procedure explains the standard procedure. If a particular case requires a different approach because of safety or other needs or wishes of the person affected, or because of particular contextual or factors, the Case Manager will adjust the procedure as required and under due consideration and thorough documentation.

Partner: If a case involves a partner organization, but Case Management is taken up by Cordaid/ICCO, a representative of the partner organization might take up certain functions in the response, including joining the Investigation Committee and the Integrity Committee in relation to the case. Ideally, the organizations should at the beginning of a partnership agree upon a Memorandum of Understanding about the division of responsibilities when integrity cases come up, including the funding of investigations.

Security: If an integrity case also constitutes a security incident or risk, the Security Advisor and the Integrity Officer coordinate who is in the lead, with the other department involved if and when necessary. As a general rule, security takes precedence if acute security risks are present. Information will be shared between the departments on a need-to-know basis. If such a case is registered as security incident and the security response is finalized, the Security Advisor informs the Integrity Officer to enable assessing a potential additional integrity response.

7. Disciplinary Measures

Disciplinary measures are regulated per applicable HR Manuals in GO and CO's. They range from mandatory training, verbal and written warnings in cases of less severe misconduct and management shortcomings, up to termination of contract in cases of severe misconduct.

Disciplinary measures are decided on a case by case basis following due consideration and documentation. As a guideline, 'Severe Misconduct' refers to cases of serious actual or potential harm to people, assets, resources, and funds, or misuse of power or authorities, including – but not limited to – child abuse, sexual abuse and exploitation, and repeated misconduct.

8. Grievance Procedure

Should a complainant, Subject of Complaint, or someone otherwise involved in a case perceive that their case was not handled appropriately, i.e. that Due Process was not followed, a grievance can be made via the following channels:

1. *Externally* through the Dutch *House of Whistleblowers*, who can make an investigation into the manner in which an employer has treated the reporter of a suspected work-related integrity issue: <https://www.huisvoorklokkenluiders.nl/onderzoek-naar-een-misstand/verzoek-tot-onderzoek>. Note that the House of Whistleblowers only considers complaints about 'of social interest', thus, among others, where the law was broken, where there is danger to the safety of persons, or where there is a 'danger to the proper functioning of the organization as a result of improper acts or omissions'.
2. Grievance Procedure laid out in the applicable HR Manual, if applicable,
3. Through the [Grievance Committee](#). The Grievance Committee follows the procedure laid out for Cordaid/ICCO's *Dispute Resolution Commission*, as described Cordaid/ICCO's [Legal Status Regulations](#). The committee consists of three members, including:
 - the chair, appointed by the other two members.
 - one member from the GO Works Council, and
 - one member being an external integrity advisor.

9. Glossary

Allegation: Assumed misconduct.

Complainant: A person who makes a complaint/report about misconduct to the organization / authorities. This can be the person affected by the misconduct, or a witness / whistleblower. The term is *not* be understood in a negative way as in 'nitpicker'.

Complaint: Report of concern, suspicion, or allegation of (potential) misconduct.

Concern: Perception of potential misconduct.

Do No Harm: The Principle of ensuring careful consideration so that through our work, no (further) harm is done intentionally or unintentionally.

Duty of Care: As a legal obligation, Duty of Care is imposed on an individual or organization by law requiring that they adhere to a standard of reasonable care while performing acts (or omissions) that present a reasonably foreseeable risk of harm to others. This includes staff and those who come into contact with our programs.

Management Concerns: Issues that are brought forward as integrity complaints that are not clearly definable as per Cordaid/ICCO's integrity policies, but still present potential integrity risks (for instance by creating an unsafe working environment).

Misconduct: Any behavior that can be reasonably be understood as breaching the standards of behavior set out in Cordaid/ICCO's Integrity Framework, Code of Conduct and related policies.

Report: See 'Complaint'.

Person affected: A person affected by misconduct, e.g. someone who was (sexually) harassed.

SoC (Subject of Complaint): The person who commits the misconduct. When speaking about someone who is suspected to have committed a misconduct, refer to 'alleged perpetrator'.

Survivor/Victim: Both terms can be used to describe persons affected by interpersonal misconduct. While some – especially those who have reached a certain state of recovery – might identify as having 'survived' the distressing incident(s), others feel more 'victimized' by them. One option that doesn't rely on knowing a person's self-identification is to refer to 'persons affected' by misconduct.

Suspicion: Perception, concern or fear about potential misconduct.