

Integrity Policy Cordaid

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1. Mission & vision

Internally Cordaid aims to have a safe workplace for all employees, free from any form of harassment and misuse of power. Externally Cordaid aims to have the highest standard of integrity concerning behaviour of its staff and all who do work for Cordaid. The protection of the most vulnerable people in fragile contexts that Cordaid works for is first and foremost.

There are the following policy starting points:

- Cordaid realizes that there is a need to further develop and maintain a culture of integrity.
- Cordaid realizes that working in different cultural contexts, working in fragile environments and the unequal relationships that go with the delivery of aid, poses challenges to maintaining high integrity standards
- Cordaid realizes that there is a grey area concerning integrity and must therefore sharpen its moral ability to distinguish 'right' from 'wrong'
- Cordaid follows a zero tolerance policy in that all breaches of the Code of Conduct are followed up. The consequences for the involved staff member(s) will be proportional¹.
- Cordaid has the full commitment of the leadership to maintain the highest integrity standards
- Cordaid recognizes that there needs to be continuous learning on this integrity, so this policy will be yearly reviewed with the aid of an external integrity advisor
- Cordaid will cooperate with the local law authorities when Cordaid staff members are involved in criminal acts
- Cordaid will assist the victims (when the breach of the Cordaid integrity standards cause personal harm) whenever possible.

The goal of the Cordaid integrity policy is:

- To have a harassment free and secure working environment for all Cordaid staff and have a workforce who act in accordance to the high integrity standards of Cordaid, with no fraud and (sexual) misconduct

To achieve this we aim:

- To increase the awareness of the integrity standards and create an atmosphere in which co-workers give each other feedback on breaches of Cordaid's norms and values.
- To have the least possible breaches of Cordaid's integrity standard through a policy of prevention and learning.
- To have a low threshold for complaints and proper protection of the reporter.
- To deal with the breaches of the integrity standards as well as possible through careful procedures of hearing both sides and fact finding where possible with proper independence.

¹ In the Code of Conduct it says: 'For Cordaid employees the Code of Conduct is directly linked to the contract of employment. Any employee who fails to comply with the Code of Conduct will be subject to disciplinary action, up to and including dismissal from employment.'

2. Cordaid values

1,2 billion people are directly affected by war, fragility and natural disasters. But the indirect impact of fragility is much bigger. More than 2 billion people live in countries where development is seriously impacted by fragility, conflict and violence. By 2030 the share of global poor living in fragile and conflict-affected situations is projected to reach 46%.

This forces people to seek safer grounds. Around 65 million people are forcibly displaced. Many of them die in the attempt to enjoy minimal levels of peace, security and prosperity.

Cordaid does not accept this world of inequality, exclusion and unsustainability. 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. Where each person is free to flourish and can live in peace.

This vision requires the highest possible integrity standards and procedures. Cordaid has the following key values that are guiding the integrity policy:

- Transparency: we report on integrity in our annual reports
- Subsidiarity: we want integrity breaches to be dealt with at the 'lowest' possible level in the organization
- Compassion: we care for victims of integrity breaches
- Accountability: we hold all staff members accountable and fully responsible for their behaviour.
- Cooperation: we work on the integrity of Cordaid in a spirit of cooperation of all staff in Global Office Office and Country Offices.

3. Structure, culture and measures

To realize the level of integrity that Cordaid aspires, measures need to be taken, some on the level of structure and some on the level of culture. Cordaid will employ a mix of the following integrity instruments:

- Procedures for recruitment and selection
- Screening procedures of new staff
- Job rotation
- Information sessions on code of conduct
- Confidential Advisors
- Gender audits
- Risk analysis (vulnerability check)
- Procedures and regulations (see below)
- Dilemma training
- Workshop integrity for supervisors

Which of these tools will be used depends on the effectiveness and efficiency of the tool given a specific situation.

4. Regulations and protocols

Protocol and regulations are there to make the integrity standards of Cordaid explicit and to have clear procedures to be followed which serve to guard and the interests and rights of victims, accused people and reporters. Cordaid has the following protocols and procedures in place:

- **Code of Conduct with handling protocol**
This document describes the behaviour that is a breach of Cordaid's values and norms and the possible consequences. The handling protocol describes the procedure to follow when a breach or suspected breach of the Code of Conduct occurred.
- **Protocol Undesirable Behaviour**
This document describes the behaviour that staff member can experience as undesirable and the victim can consult with the confidential councillor and file a complaint with the Compliant Committee
- **Whistle-blower policy**
This document allows anybody to report major irregularities or misconduct and enjoy protection from possible repercussions and the document describes how the top management must act.
- **Anti-money laundering policy**
- **Anti-corruption policy**

All breaches or alleged breaches of the Cordaid integrity norms are taken up in a central registration table with details about the nature of the breach, the way it was researched and the outcome. Yearly the anonymous report of the (alleged) breaches is published in the Social Annual Report with the number of reports and the nature of the incidents.

5. Roles, responsibilities and position

Integrity is not only the organization's responsibility for having regulations, established institutes, functionalities and a number of measures. But everyone in the organization has a task and responsibility with regards to integrity. The following groups have a special responsibility.

• Supervisors

Supervisors serve as an example. They must show honest behaviour and good leadership which is seen by employees and has an effect on the integrity of all employees. The supervisor is responsible for monitoring and stimulating integrity in the workplace. To prevent misconduct and irregularities, supervisors must create integrity awareness and inform employees who do not act with integrity. The employer and all supervisors do so proactively.

• HR

HR has the task of pursuing a policy and cherishing a culture that are aimed at an honest organization and a corporate culture in which abuses and irregularities are prevented. They promote integrity awareness and act with integrity. In addition, they take measures that reduce the chance of incidents and reduce risks. HR provides information and training to

employees and supervisors about the risks and also facilitate adequate reception and possibilities for the safe reporting of abuses.

• **The Works Council**

The Works Council has an important role in ensuring a safe workplace. The Works Council has right of consent to the integrity policies as stipulated in the Law House for Whistle Blowers. The Works Council has both a stimulating and controlling role on integrity with regards to the employer.

Besides these roles for integrity of different functions and functionalities, there are specialized roles and committees in Cordaid. Centrally (in Global Office) there are

- **Two internal confidential advisors²**
Appointment: Nominated by HR and appointed by BoD
Responsibility: First reception, advice and support for persons with complaints on aggression, violence, discrimination, (sexual) intimidation or harassment and other unwanted behaviour (see protocol Unwanted Behaviour)
- **One external confidential advisor**
Appointment: Nominated by Company Physician and appointed by BoD
Responsibility: First reception, advice and support for persons with complaints on aggression, violence, discrimination, (sexual) intimidation or harassment and other unwanted behaviour who do not want to confide the internal Confidential Advisor
- **Complaint Committee** (see Undesirable Behaviour Policy)
Appointed: One member by BoD, one member by Works Council and chairperson chosen by the two members
Responsibility: Handles complaints on unwanted behaviour (see protocol Unwanted Behaviour)
- **Supervisors**
Responsibility: Secures a proper understanding of the Code of Conduct and consequences of breaches (see Cordaid Code of Conduct)
- **Integrity Committee**
Appointment: the members are appointed on the basis of their personnel competences
Responsibilities: Develops an integral integrity policy for the whole of Cordaid, ensures the implementation the integrity annual plan and oversees the quality of case management
- **External integrity specialist**
Appointed: appointed by the BoD
Responsibilities: Consults, trains and investigates on the request of the Integrity Committee

Decentrally (in all Country Offices)

- **One confidential advisor per Country Office**
The aim is to have a confidential advisor in each Country Office, but this needs to be done in a way that is fitting in the cultural context. This may lead to different solutions.
Appointment: Nominated by the Country Office Director and appointed by BoD

² The confidential advisors could follow a training to become integrity advisors.

Responsibility: First reception, advice and support for persons with complaints on aggression, violence, discrimination, (sexual) intimidation or harassment and other unwanted behaviour. There is a community of Confidential Advisors of all the Cordaid locations.

6. Monitor, evaluation and reporting

Cordaid will monitor, evaluate and report on the following:

- Anonymous annual reports of the Confidential Advisors (the number and kind of cases and the learning activities). This will be published in the Social Annual Report.
- Anonymous annual report on the number of breaches of the Code of Conduct, the kind of cases and the outcome. This will be published in the Cordaid Annual Report.
- The annual integrity action plan for prevention and learning (the outcome of the action plan and further steps forward). This will be published in the Cordaid Annual Report.

On the issue of integrity there is communication with:

- Direct stakeholders (suspect, complainers, victims, reporters, confidential Advisor, etc.)
- Staff internally
- Institutional Donors (including government)
- Private Donors
- Partners
- Press
- Other relevant stakeholders

7. Means

In order to realize this integrity policy there is time allotted to the Confidential Advisors, the members of the Integrity Committee and facilities for the Complaints Committee.

8. Integrity in the Chain

Cordaid is also responsible for the integrity in the chain. Therefore Cordaid has a Code of Conduct for partners who execute work for Cordaid. All new Cordaid partners will need to sign this Code of Conduct before becoming a contract partner of Cordaid.

Appendix: Definition of Terms

Integrity – the faithful and consistent application of generally accepted public values and norms in the daily practice of Cordaid; the proper use of powers, authorities, assets, resources and funds according to the official purpose for which they are intended, with the end in view of promoting public welfare.

Integrity Management – the continuous process of building, enforcing and fostering a culture of integrity within an organization or institution.

Integrity Measures – policies, programs and systems that provide an enabling environment for integrity management in an organization or institution. These are responses of Cordaid to address issues, vulnerabilities and concerns, and may come in the form of a set of policies, systems, programs and activities to operationalize the well-identified integrity values, principles and standards.

Integrity Management Structure – the assignment and designation of roles, authorities and responsibilities of the people within an the organization to plan, implement, review and improve the Integrity Management Plan.

Cordaid Integrity Committee – the committee primarily responsible for effectuating the agenda of the Integrity Management Plan, and overseeing the quality of the way in which the policies, protocol and regulations are effectuated.

Integrity Management Documentation – the knowledge base of the integrity management structure needed for the continual improvement of organizational systems and processes.

Integrity Plan – a document that identifies and details Cordaid’s requirements, concerns and specific courses of action in response to its integrity management needs and in pursuit of its integrity objectives.