

INTEGRITY POLICY & PROCEDURE FRAMEWORK

SEPTEMBER, 2023

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1. INTRO

Cordaid's mission is to have a world where people are safe, can develop themselves, have freedom, have access to social services, have inclusive economic opportunities and care for the environment. Where people live in a society that upholds their rights and where they can realise one's potential and fully participate in their societies. A world where people strive together towards dignified and healthy lives in equitable and resilient societies. 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 everybody, 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:

Code of Conduct

Defines Cordaid's general standards of behaviour.

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.

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.

Conflict of Interest Policy

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

Anti-terrorism & anti-money laundering policy

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

Integrity Standard Operating Procedures (SOPs)

Defines the procedures how to report and handle complaints.

This Framework consolidates the Integrity Policy & Procedure of December 2020.

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 adapted in coordination with the Integrity & Safeguarding Officer and Country/Cluster Director, to be approved by 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 Whistle-blowers Act, GDPR Privacy regulations and relevant standards in the sector.

When differences 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 learning 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 one, 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 behaviour 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 centred 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 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 behaviour 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.

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

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
Organisational	Anonymized case metrics Risk analysis of processes and positions (Partos)	Yearly Every three years	Integrity Committee, Supervisory Board, Risk Committee Quality Management
Global Office and Country Offices	Gender & Integrity Assessment	Once every three years	Integrity & Safeguarding Officer, Reporting to CIC,
	Fraud Risk Assessments	Once every three years	Anti-Corruption & Anti-Fraud Officer, Reporting to CIC, Country Director in T reporting to BoD
	Integrity Status report in T Report	Three times per year	
Field Office	Gender & Integrity Assessment	Once	Office Manager / Team Leader
	Update	Yearly	
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 in risk analysis of positions.

7. ROLES & RESPONSIBILITIES

7.1 General

ALL CORDAID REPRESENTATIVES (INCL. STAFF, VOLUNTEERS, INTERNS)

Mandate	<ul style="list-style-type: none"> ■ Read and adhere to Cordaid's Integrity Policies and Code of Conduct. ■ Participate in integrity trainings. ■ Be accountable for own actions. ■ Apply Cordaid's Core Values in everyday work. ■ Report integrity concerns. ■ Self-disclose potential Conflicts of Interest and any previous misconduct.
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ALL MANAGERS

Mandate	<ul style="list-style-type: none"> ■ Lead by example by living Cordaid's Integrity standards and Core Values. ■ Ensure that all new employees follow the onboarding tool. ■ Ensure that integrity measures are implemented within their area of responsibility. ■ Enable an environment where staff can feel safe to speak out. ■ Organise team discussions around the Code of Conduct and creation of a safe working environment conducive to speaking up and resolving conflicts. ■ Notify the Integrity & Safeguarding Officer or the Anti-corruption and Fraud Officer about any received complaints. ■ Handle management concerns related to Integrity. ■ Act as Decision Makers where appropriate. ■ Implement follow-up measures after an investigation.
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ALL PROJECT LEADS

Mandate	<ul style="list-style-type: none"> ■ Conduct partner and project risk assessment and put in place mitigation measures including capacity-building. ■ Secure Budget for integrity, such as capacity-building or communication materials. ■ Communicate Integrity Standards to all stakeholders (including beneficiaries, partners, consultants and donors) with the support of the Integrity & Safeguarding Officer where required. ■ Establish and maintain (or align with existing) community-based complaint mechanisms in line with best practice guidance. ■ Notify the Integrity & Safeguarding Officer or the Anti-corruption and Fraud Officer of integrity concerns or allegations that arise in relation to the project or project-related staff (via CD/manager).
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ALL PROJECT OWNERS

Mandate	<ul style="list-style-type: none"> ■ Ensure compliance with integrity-related project responsibilities.
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ALL BID MANAGERS

Mandate	<ul style="list-style-type: none"> ■ Ensure that budget for integrity, such as staff time, capacity-building or communication materials are included in the proposed project budget.
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7.2 Specific

CHAIR OF CORDAID'S SUPERVISORY BOARD

Mandate	<ul style="list-style-type: none"> ■ Oversee integrity management in Cordaid. ■ Receive integrity reports related to the behaviour of BoD members.
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CORDAID CEO

Mandate	<ul style="list-style-type: none"> ■ Overall responsibility over integrity management in Cordaid. ■ Overall accountability of Integrity cases, specifically interpersonal & safeguarding cases. ■ As a member or the chair of the decision committee, take decisions in disciplinary measures. ■ See Annex 6 Case Management Matrix in SOP. ■ Create an enabling environment, including leading by example, ensuring time and financial capacity allocation for integrity, and by promoting the Integrity Framework as well as integrity initiatives and trainings.
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CORDAID CFO

Mandate	<ul style="list-style-type: none"> ■ 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. ■ Overall accountability of integrity cases, specifically on financial cases such as corruption, fraud and money laundering. ■ As a member or the chair of the decision committee, take decisions in disciplinary measures. See Annex 6 Case Management Matrix in SOP.
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CORDAID COO

Mandate	<ul style="list-style-type: none"> ■ 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. ■ Overall accountability to take decisions on disciplinary measures as a member of the BoD. See Annex 6 Case Management Matrix in SOP.
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CORDAID INTEGRITY COMMITTEE (SEE ANNEX 1 TOR FOR DETAILS)

Appointed by	Board of Directors
Consists of	Senior management & technical advisors on integrity issues.
Mandate	<p>Monitor and oversee updates to the relevant integrity policies and procedures for the whole Cordaid.</p> <p>Ensure the implementation of the Integrity Year Plan including training and culture.</p> <p>Annual reporting on complaint metrics.</p> <p>Yearly analysis of anonym sample cases and advising the BoD on integrity and culture related issues.</p> <p>Receive tertial reports which will encompass trends, top line case information, and significant risks identified in the management.</p>

CORDAID CASE COMMITTEES: A) INTERPERSONAL AND B) FINANCIAL (SEE ANNEX 2 TOR FOR DETAILS)

Appointed by	<p>Decision Maker or Committee (see: Annex 6 of the Integrity SOP)</p> <p>Non-high-sensitive cases and on country level (and where the Country/Cluster Director is not involved): a case committee will be appointed by the Country/Cluster Director as the Decision Maker or Chair of the Decision Committee in consultation with the Integrity & Safeguarding Officer or the Anti-corruption and Fraud Officer.</p> <p>Global Office cases and/or high sensitive cases: Case Committee will be appointed by the BoD or Supervisory Board (if the BoD is implicated or Conflicted) as the Decision Maker or Decision Committee in consultation with the Integrity & Safeguarding Officer or the Anti-corruption and Fraud Officer.</p> <p>Depending on the Nature of the Case a Decision Maker or a Decision Committee of a Min of two persons could be recommended.</p> <p>Decision Maker:</p> <p>This is a person who-in the end of the process has to decide upon the investigation report and follow-up actions including disciplinary actions/proceedings in consultation with other management staff.</p> <p>Decision Committee:</p> <p>This is a minimum of two persons who in the end of the process has to decide upon the investigation report and follow-up actions including disciplinary actions/proceedings in consultation with other management staff.</p> <p>Exception only in non-sensitive cases on country level. The Decision Maker/Committee is who-in the end of the process has to decide upon the investigation report and follow-up actions including disciplinary actions/proceedings.</p> <p>The Decision Maker/Committee is accountable for the quality of the investigation and writes the ToR for the case committee as assignment. The Chair of the decision committee is the case owner. The case committee oversees any inquiries or investigations as a team.</p>
Consists of	<p>The members of the Case Committee are appointed depending on the nature of the case: for instance the Integrity & Safeguarding Officer or the Anti-corruption and Fraud Officer, the integrity focal point, an (internal) expert like a business controller.</p> <p>Technical Experts can be involved for specific input or assignments include but not limited: HR advisor (CO or GO) and/or legal advisor and/or Safety & security advisor and/or gender expert and/or IT specialist, communication expertise, donor expertise and quality management expertise.</p> <p>The Case Committee consists of a minimum of 2 persons. All decisions in the case management are made by the Case Committee. The Case Committee gives regular updates on the case to the Decision Maker/Committee and if needed steering moments (depending on the size and severity of the case).</p>
Mandate	<ul style="list-style-type: none"> ■ Assess severity of cases. ■ Delegate cases or manage cases themselves. ■ Investigate cases. ■ Update the Decision Maker/Committee on matters concerning case management, investigations, and the outcome of the investigation (substantiated or not).

CORDAID INTEGRITY AND SAFEGUARDING OFFICER

Appointed by	CEO
Mandate	<ul style="list-style-type: none"> ■ Advise Cordaid on Integrity matters. ■ Receive complaints and allegations of integrity breaches. ■ Develop and improve Cordaid's integrity policies and procedures. ■ Organise integrity trainings on various levels. ■ In close cooperation with the Anti-Corruption and Anti-fraud Officer, divide the cases and advise together on the composition of the case committees. ■ Maintain and update the Integrity Case register. ■ Manage, lead and support integrity cases including fact-finding inquiries and investigations (including the appointment of external investigators). ■ Support staff who experienced or witnessed misconduct. ■ Analyse risks and propose mitigation measures. ■ Regular reporting on integrity trends and complaint metrics. ■ Support organisational and project-related Due Diligence process. ■ Raise awareness and strengthening integrity capacity in all Cordaid offices. ■ Report to Supervisory Board / Remuneration Committee.

CORDAID ANTI-CORRUPTION AND ANTI-FRAUD OFFICER

Appointed by	CFO
Mandate	<ul style="list-style-type: none"> ■ Advise Cordaid on Integrity Matters ■ Receive allegations of fraud and corruption ■ Develop and improve Cordaid's Integrity policies and Procedures. ■ Discuss fraud risks with the board, and the Integrity committee. ■ Organise fraud and corruption awareness training for staff. ■ Organise fraud and corruption investigation training for those handling cases. ■ In close cooperation with the Integrity and safeguarding Officer, divide the cases and advise together on the composition of the case committees. ■ Manage, Lead and support fraud and corruption investigations (including the appointment of external investigators) with relevant line management. ■ Support staff who experienced or witnessed misconduct. ■ Maintain and update the Integrity Case register. ■ Report to the Supervisory Board /Audit Committee.

COUNTRY /CLUSTER DIRECTOR

Mandate	<ul style="list-style-type: none"> ■ Overall responsibility of localising and implementing Integrity Policy & Procedure Framework. ■ Enable and show support for Integrity Focal Point and Confidential Advisors in the Country/Cluster office. ■ Main contact person for Integrity at CO level (next to Integrity Focal Point). ■ Enable the implementation of applicable internal and external trainings. ■ Disseminate policies, procedures, and visibility materials. ■ Undertake or support Risk Assessments and Mitigations at Country/Cluster Office Level, create and ensure follow up via an Office Action Plan. ■ Ensure that proposals include appropriate budget for integrity. ■ Ensure that appropriate community-based complaint mechanisms in projects, linked to Cordaid's integrity system, are in place and working. ■ Be Chair or member of a decision committee of a case. ■ Or, possible, in case of not being part of the decision committee member of the Case Committee ■ 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.
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MANAGER GLOBAL OFFICE

Mandate	<ul style="list-style-type: none"> ■ Overall responsibility of localising and implementing Integrity Policy & Procedure Framework. ■ Enable and show support for Integrity & Safeguarding Officer and Anti-Fraud and Corruption Officer and Confidential Advisors in the Global Office. ■ Main contact person for Integrity at the department of which they are the manager. ■ Enable the implementation of applicable internal and external trainings. ■ Disseminate policies, procedures, and visibility materials. ■ Undertake or support Risk Assessments and Mitigations at department /Global Office Level, ■ Ensure that proposals include appropriate budget for integrity. ■ Ensure that appropriate community-based complaint mechanisms in projects, linked to Cordaid's integrity system, are in place and working. ■ Be Chair or member of a decision committee of a case. ■ Or, possible, in case of not being part of the decision committee – be a member of the Case Committee ■ 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.
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INTEGRITY FOCAL POINTS (SEE ANNEX 3 TOR FOR DETAILS)

Appointed by	Integrity Committee
Consists of	trained staff with appropriate gender, country and operations representation.
Mandate	<ul style="list-style-type: none"> ■ Case management (as member of a case committee) ■ Support Safeguarding & fraud Investigations together with Integrity Officer or Anti-corruption and Anti-Fraud officer. ■ Support Risk Assessments and Mitigations on different levels as required. ■ Support awareness raising on integrity matters across the organisation.

CONFIDENTIAL ADVISORS (SEE ANNEX 4 TOR FOR DETAILS)

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">■ Support staff who experienced or witnessed misconduct.■ Support awareness raising on integrity.■ Confidential Advisors should, if possible, <i>not</i> be appointed Integrity Focal Points or Decision Makers.

8. 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 organisations, 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](#) via the partner risk assessment. Wherever there are gaps on Cordaid's or the partner organisation'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. In case we are in consortia where other another organisation is in the lead; it is primarily the responsibility of the lead organisation.

9. MONITORING & REPORTING

REPORT	CONTENT	AUDIENCE	REPORTING FREQUENCY	OWNER
Case Registry	<p>Integrity cases are registered in an online confidential case management system and in a file to allow for internal oversight and monitoring.</p> <p>To ensure privacy, the file including case details is stored safe from unauthorised access, accidental deletion or alteration.</p>	<p>Integrity & Safeguarding Officer, Anti-corruption and Anti-fraud Officer and Integrity Support Officer</p> <p>CEO or CFO upon request.</p>	Ongoing	Integrity & Safeguarding Officer, Anti-Corruption and Anti-fraud Officer and Integrity Support Officer
KPIs	<p>Efforts to strengthen Integrity are monitored with the following KPIs:</p> <ul style="list-style-type: none"> % reports received and followed up. All new staff screened with background check. GO and all CO have at least 1 confidential advisor. Staff report knowing how to report an integrity issue. % progress of Roll out of the Code of Conduct & Integrity framework. 	Cordaid internal	Annually	Integrity & Safeguarding Officer, Anti-corruption and Anti-fraud Officer
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 & Safeguarding Officer, Anti-Corruption and Anti-fraud Officer
Financial Integrity Report	Financial Integrity report with case metrics, no identifying details (including names) are shared.	Audit Committee & Supervisory Board	Tertial	Anti-corruption and Anti-fraud Officer
Safeguarding and Integrity Report	<p>Safeguarding and integrity Report with case metrics, no identifying details (incl. Names) are shared.</p> <p>General updates on integrity news on the framework, ongoing integrity initiatives, new focus areas.</p>	Remuneration Committee and Supervisory Board	Tertial	Integrity & Safeguarding Officer, Anti-Corruption and Anti-Fraud Officer

Internal Fraud and Corruption update	Update on fraud & corruption cases with financial impact	External auditors	Quarterly	Anti-corruption and Anti-Fraud 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 or local laws on a strict need-to-know basis. No identifying details (including names) are shared unless required by law.	Donors, relevant local authorities, CBF	Case-by-case basis	Project Lead, Decision Maker/Committee in close cooperation with Integrity & Safeguarding Officer and Anti-corruption and Anti-Fraud Officer

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.

10. 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 counsellors), 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.

11. DISSEMINATION

The first edition of this framework was launched during a Cordaid morning with a remote option to ensure all staff worldwide can follow. The Integrity Framework, Code of Conduct and Integrity Policies will be shared with all existing and new representatives via email and integrated into face-to-face as well as online trainings and is part of the Integrity e-learning. 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 organisations 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. Country/Cluster Directors and Country Managers are responsible to facilitate translations into other relevant languages to ensure that the documents are accessible and understandable to all staff and relevant stakeholders.

12. RELATED POLICIES

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/Cluster Office-specific policies, e.g., South Sudan
- Community-based reporting mechanisms
- Humanitarian Aid Feedback and Complaint Mechanism Guidance document

13. REVISION

This framework and the included policies and procedures will be revised for necessary updates at least bi-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 and its related policies and procedures is relevant, appropriate, accessible, and applied in the whole of Cordaid.
- Advise and oversee the implementation of the Integrity Year Plan.
- Analyse 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.
- Influence the adoption of policies, procedures and systems that promote integrity in 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

The Board of Directors appoint members. 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.

Training

Members of the Integrity Committee will receive training on integrity.

Reporting

Members of the Integrity Committee contribute to the Annual report for the Supervisory Board and the organisational Annual Report. Fraud and Integrity cases are summarised for the Board of directors, Audit Committee Remuneration Committee and Supervisory Board each trimester in separate Internal Fraud or Integrity Reports and tertial with the External Auditors

Accountability

To ensure the quality and effectiveness of the Integrity Committee, and to give members the opportunity to be recognised 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).

a) Integrity Committee

IN 2021 COMPOSITION	PROPOSED NEW
Chair /HR	Chair: HR director
Secretary	
BoD - CEO	BoD – CEO
Country Director	Integrity Focal Point
Member Programme Unit	Member Programme: Gender specialist
Integrity & Safeguarding Officer	Integrity & Safeguarding Officer
Anti-Corruption and Anti-Fraud officer	Anti-Corruption and Anti-Fraud Officer
Legal advisor	Legal advisor

Names of members of the Integrity Committee can be found at [Current composition](#)

b) Integrity Crisis Team (in case of an integrity case which is severe and a crisis for our organisation)

CORE TEAM	JOB TITLE
Leader	Chief Executive Officer
Coordinator	Integrity officer/ anti-corruption and anti-fraud officer

Log keeper	Operations Manager
Member Human Resource	Human Resources Director
Member PU	Integrity Focal Point
Member Communications	Corporate Communications Officer

ANNEX 2: TOR CASE COMMITTEES

General

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

Responsibilities

- Pre-assess severity of cases,
- Assign or take up Case Management,
- Investigate or manager external investigators to investigate (suspected) Integrity breaches,
- Update the Decision Maker/Committee on matters concerning case management, investigations, and outcome of the investigation,
- Prepare evaluation, learning session together with CIC when needed.
- 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 sometimes chaired by the Integrity Officer or the Anti-Corruption and Anti-fraud Officer, respectively. Other members are appointed by the Decision Maker/Committee (see Integrity SOP). The appointment is valid during the employment with Cordaid, with the option of premature termination on the request of Case Committee member. 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 organisational Annual Report.

Accountability

To ensure the quality and effectiveness of the Case Committees, and to give members the opportunity to be recognised 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).

See for more specific guidance on the composition of the Case Committee this framework under paragraph 7.2 and the Integrity SoP under step 3 including the Annex 6 Case Management Matrix in the Integrity SoP.

ANNEX 3. TOR INTEGRITY FOCAL POINTS

General

Integrity Focal Points are staff based in a Country Office, trained to support the implementation and localisation of Cordaid's Integrity Framework, to strengthen Case Management capacities, and to conduct investigations.

The appointment of Integrity Focal Point per each Country Office is strongly recommended.

Integrity Focal Points:

- mitigates the fact that building integrity capacity at Country/Cluster Office level will be a longer-term process that includes further time and financial investment, as well as distinction from the existing Confidential Advisor role¹.
- strengthens collaboration between Country/Cluster 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.
- Integrity Focal Points can take up additional responsibilities (e.g., advising on and revising Cordaid's Integrity Framework) and they support and lead –together with the other Focal Points and Integrity & Safeguarding Officer and Anti-Fraud and Corruption Officer on developing a culture of integrity in all we do in the whole of Cordaid.

Responsibilities

- Receive concerns, suspicions, ore allegations of integrity breaches and notify the Integrity & Safeguarding Officer or the Anti-Corruption and Anti-Fraud Officer in this situation.
- Potentially participate in Case Committees including conducting investigations
- Support other integrity initiatives such as localisation 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,

¹ 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 Whistle-blowers, The Reporting Procedure, p.20).

- 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.

Training

Integrity Focal Points will receive general training to fulfil their function, as well as safeguarding and or anti-corruption and/or anti-fraud 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 or the Anti-corruption and Anti-fraud Officer. The line manager remains the sole manager of the staff member. In case of conflicting time commitments, the Decision Maker/Committee can request the Integrity Focal Points to be freed up fully or partially for the duration of a particular assignment.

Accountability

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

The names of Integrity Focal Points can be found at [Current composition](#).

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 & Safeguarding 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 complaint's 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 Board of Directors.

Reporting

The Confidential Advisors in each country/cluster 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/Cluster 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.

The names of Confidential Advisors can be found at [Current composition](#)

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, healthcare, education and agrifood systems. We are supported by 250,000 private donors in the Netherlands and by a worldwide partner network. Cordaid is a founding member of Caritas Internationalis, CIDSE, and ACT Alliance.

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