# INTEGRITY POLICY & PROCEDURE FRAMEWORK

Cordaid

BUILDING FLOURISHING COMMUNITIES

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# 1. INTRO

Cordaid/ICCO'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/ICCO has the full commitment of the leadership to maintain the highest integrity standards to ensure that in pursuing our mission, Cordaid/ICCO 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/ICCO is a safe and welcoming workplace for every body, that we treat everyone who comes into contact with Cordaid/ICCO 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/ICCO's approach to Integrity and guides Cordaid/ICCO 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/ICCO to work towards a stronger culture of integrity, trust, and mutual accountability.

This document provides the 'glue' that connects Cordaid/ICCO's different policies and procedures related to Integrity:
1. **Code of Conduct Cordaid / Code of Conduct ICCO**[1]
   Defines Cordaid/ICCO's general standards of behavior.
2. **Safeguarding Policy**
   Defines Cordaid/ICCO's standards to ensure the well-being and safety of everyone who comes into contact with Cordaid/ICCO, including staff and adult and child beneficiaries.
3. **Fraud Policy**
   Defines Cordaid/ICCO'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*).

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[1] Cordaid and ICCO are in the process of developing a common Code of Conduct. During the transition period – until the new Code of Conduct is approved in 2021 – the Cordaid Code of Conduct will apply to Cordaid representatives and in Cordaid contracts, and the ICCO Code of Conduct will apply to ICCO representatives and in ICCO contracts.

# 2. APPLICABILITY

This framework aims to provide a coherent overview of integrity regulations applicable across all Cordaid/ICCO 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/Cluster Director as well as the Integrity Committee.

The policies included in this framework are '24h-policies' – they indicate standards of behaviour that every Cordaid/ICCO representative should be able to expect leadership, staff and other representatives to adhere to at all times. Upon signing their contract, Cordaid/ICCO 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 and relevant standards in the sector.

When irregularities occur between Dutch and Country/Cluster 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/ICCO 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/ICCO, and how Cordaid/ICCO 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/ICCO. '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/ICCO is guided by the following principles:

- **Shared commitment**: all Cordaid/ICCO representatives are responsible to contribute to making Cordaid/ICCO a safe workplace and a safe place for everyone who comes into contact with Cordaid/ICCO, 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/ICCO 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 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/ICCO's Core Values *Trust, Mutual Accountability, Collaboration,* and *Solution-Orientation*, which are particularly important in relation to integrity issues.

# 5. INTEGRITY CYCLE: KEY COMPONENTS TO STRENGTHEN INTEGRITY

Cordaid/ICCO'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:



Integrity Cycle

| Prevention | Reporting | Response | Learning |
|---|---|---|---|
| ■ Common Integrity Standards (Policies & Procedures)<br>■ Integrity Structures in Place<br>■ (Child-)Safe Recruitment Standards<br>■ Factiva / background check for signatories<br>■ Awareness: Basic and Follow-up Integrity Trainings for all Cordaid/ICCO representatives, communications & visibility materials (on- and offline, for internal and external stakeholders), training of partners<br>■ Gender & Integrity Assessments of all offices<br>■ Risk Analysis and Mitigation<br>■ Integrity Culture:<br>  o Team discussions around the Code of Conduct and creation of a safe working environment conducive to speaking up and resolving conflicts<br>  o Awareness Sessions on Core Values | ■ Established Reporting Procedure with accessible and confidential reporting channels for Cordaid/ICCO representatives and third parties, including beneficiaries.<br>■ Protection from retaliation<br>■ Internal and external support offered to those affected, including support by Confidential Advisors | ■ Established Response Procedure<br>■ Thorough documentation<br>■ Trainings for everyone handling cases: Case Managers, internal Investigators, Confidential Advisors, Integrity Committee members<br>■ Regular reporting on Compliance and Complaint Metrics to different stakeholders and publicly through Annual Report | ■ Analysis of feedback from workshops and Annual Survey results<br>■ Evaluation of cases, near misses, financial losses, Case Management and trends<br>■ Insights from Gender & Integrity Assessments operationalized via Integrity Action Plans<br>■ 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 |
|---|---|---|---|
| Organizational | Anonymized case metrics<br><br><br>Risk analysis of processes | Yearly<br><br><br>Every three years | Integrity Committee, Supervisory Board, Risk Committee<br><br>Quality Management |
| Global Office and Country/Cluster Offices | Gender & Integrity Assessment Fraud Risk Assessments<br><br>Update | Once<br><br><br>Yearly | Integrity Committee, Country/Cluster Director |
| Field Office | Gender & Integrity Assessment<br><br>Update | Once<br><br>Yearly | Office Manager / Team Leader |
| 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 | Creation of new Job Description | HR |

# 7. ROLES & RESPONSIBILITIES

## 7.1 General

| All Cordaid/ICCO representatives (incl. staff, volunteers, interns) | |
| --- | --- |
| Mandate | <ul><li>Read and adhere to Cordaid/ICCO's Integrity Policies</li><li>Participate in integrity trainings</li><li>Be accountable for own actions</li><li>Apply Cordaid/ICCO'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><li>Lead by example by living Cordaid/ICCO'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>Organize team discussions around the Code of Conduct and creation of a safe working environment conducive to speaking up and resolving conflicts</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><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/Country Manager).</li></ul> |

| All Project Owners | |
| --- | --- |
| Mandate | <ul><li>Ensure compliance with integrity-related project responsibilities.</li></ul> |

| All BID Managers | |
| --- | --- |
| Mandate | <ul><li>Ensure compliance with Cordaid/ICCO's integrity minimum standards, including ensuring that budget for integrity, such as staff time, capacity-building or communication materials is included in the proposed project budget.</li></ul> |

## 7.2 Specific

| Chair of Cordaid/ICCO's Supervisory Board | |
|---|---|
| Mandate | ■ Oversee integrity management in Cordaid/ICCO.<br>■ Receive integrity reports related to the behaviour of BoD members. |

| Cordaid/ICCO CEO | |
|---|---|
| Mandate | ■ Overall responsibility over integrity management in Cordaid/ICCO,<br>■ 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. |

| Cordaid/ICCO CFO | |
|---|---|
| Mandate | ■ 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. |

| Cordaid/ICCO COO | |
|---|---|
| Mandate | ■ 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. |

| Cordaid/ICCO Integrity Committee | |
|---|---|
| Appointed by | CEO |
| Consists of | Senior management & technical advisors with authority to decide on disciplinary measures. |
| Mandate | ■ Monitor and update relevant integrity policies and procedures for the whole Cordaid/ICCO,<br>■ Ensure the implementation of the Integrity Year Plan,<br>■ Take decisions on disciplinary measures,<br>■ Oversee case management,<br>■ Annual reporting on complaint metrics. |

| Cordaid/ICCO Case Committees: a) Interpersonal and b) Financial | |
|---|---|
| Consists of | 2-3 internal experts with appropriate gender representation, appointed by the respective chairs:<br>a) Interpersonal: Integrity Officer (Chair), Integrity Focal Points/Gender/SGBV experts<br>b) Financial: Internal Auditor (Chair), financial/audit/compliance experts |
| Mandate | ■ Receive complaints,<br>■ Assess severity of cases,<br>■ Delegate cases to supervisor or manage cases themselves,<br>■ Investigate cases,<br>■ Make recommendations to Case Managers and the Integrity Committee. |

| **Cordaid/ICCO Integrity Officer** | |
|---|---|
| Appointed by | CEO/HR |
| Mandate | ■ Advise Cordaid/ICCO on Integrity matters,<br>■ Develop and improve Cordaid/ICCO's integrity policies and procedures,<br>■ Organize integrity trainings on different levels,<br>■ Manage or support integrity cases including fact-finding inquiries and investigations (including the appointment of external investigators),<br>■ Analyze risks and propose mitigation measures,<br>■ Regular reporting on integrity trends and complaint metrics,<br>■ Support organizational and project-related Due Diligence process,<br>■ Raise awareness and strengthening integrity capacity in all Cordaid/ICCO offices. |

| **Cordaid/ICCO Internal Auditor** | |
|---|---|
| Appointed by | CFO/HR |
| Mandate | ■ Advise on internal control improvements to prevent error, loss and fraud,<br>■ Discuss fraud, mismanagement risks and losses with the board, external auditor, and the audit committee,<br>■ Organize fraud awareness training for staff<br>■ Organize fraud investigation training for those handling cases<br>■ Lead fraud investigations (including the appointment of external investigators) with relevant line management,<br>■ Review compliance with integrity policies & procedures |

| **Country/Cluster Directors** | |
|---|---|
| Mandate | ■ Overall responsibility of localizing and implementing Integrity Policy & Procedure Framework.<br>■ Main contact person for Integrity at CO level, unless otherwise specified (i.e. Integrity Focal Point).<br>■ Enable the implementation of applicable internal and external trainings.<br>■ Disseminate policies, procedures, and visibility materials.<br>■ Undertake or support Risk Assessments and Mitigations at Country/Cluster Office Level, create and ensure follow up via an Office Action Plan.<br>■ Ensure that proposals include appropriate budget for integrity.<br>■ Ensure that appropriate community-based complaint mechanisms in projects, linked to Cordaid/ICCO's integrity system, are in place and working.<br>■ In consultation with Case Committees: Case Management.<br>■ 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. |

| Regional Integrity Focal Points | |
|---|---|
| Appointed by | Integrity Committee |
| Consists of | trained staff with appropriate gender & country representation |
| Mandate | <ul><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/Cluster Directors |
| Consists of | at least 2 trained staff per office, at least one of them female. + 1 external |
| Mandate | <ul><li>Support staff who experienced or witnessed misconduct</li><li>Support awareness raising on integrity</li><li>Confidential Advisors should, if possible, *not* be appointed Integrity Focal Points or Case Managers.</li></ul> |

**Other roles:**

Field Office Managers and Country Managers 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 Country managers 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/ICCO 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/Cluster Directors and the Integrity Officer in the implementation of this Framework.

**Quality management** staff assist the Integrity Officer in donor due diligences and in ensuring that the Integrity framework, policies and procedures are in compliance with legal requirements, the ISO/Partos 9001 standard, and with other relevant standards in the sector.

# 6. CHAIN RESPONSIBILITY

Based on legal, donor, and sector requirements as well as our own moral responsibility, reputational and safety considerations, Cordaid/ICCO 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/ICCO'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.<br><br>CEO and HR Director upon request. The anonymized Case Registry is accessible to Cordaid/ICCO's Integrity Committee. | ongoing | Integrity Officer Internal Auditor |
| KPIs | Efforts to strengthen Integrity are monitored with the following KPIs:<br>1. % reports received at Integrity Committee followed up.<br>2. All new staff screened with background check.<br>3. GO and all CO have at least 1 confidential advisor.<br>4. Staff report knowing how to report an integrity issue.<br>5. Staff report feeling comfortable to report an integrity issue.<br>6. % progress of Roll out of the Code of Conduct & Integrity framework. | Cordaid/ICCO internal | Annually | Integrity Officer HR Director |
| Annual Report | For full transparency, Cordaid/ICCO 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/ICCO 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/ICCO to fulfil its chain responsibility and to streamline attention to integrity strengthening efforts into all our work, Cordaid/ICCO will follow a two-tier approach:

1. Inclusion of costs for integrity in project budgets: capacity building of Cordaid/ICCO 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/ICCO 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/ICCO 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/ICCO'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/ICCO and suppliers will receive the framework as part of their introduction to Cordaid/ICCO.

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/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.

# 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/ICCO 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, 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.

This version of the Integrity Framework, related policies and procedures has been created in December 2020 – using Cordaid's documents as a basis – to allow for a joint integrity approach between Cordaid and the ICCO Foundation. During a transition period in 2021, additional updates will be made in particular with regards to the full integration of the two organizations.

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

## ABOUT CORDAID/ICCO

Cordaid/ICCO 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/ICCO is a founding member of Caritas Internationalis and CIDSE.

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