

# INTEGRITY POLICY ICCO COOPERATION

October 2019

## Policy Statement

In 2018 a number of issues surrounding sexually intolerant behavior and abuse of power by employees of various NGOs came to light.

Such behavior goes against everything that we stand for and is unacceptable. As emergency aid and development organizations in the Netherlands, we want to do everything to prevent such behavior. We can also be expected to take firm action in the event of serious misconduct and be transparent about the measures taken.

In our sector as NGOs / development organisations, Partos and Goede Doelen Nederland, we have jointly developed an [‘Integrity System Guide’](#).

For this policy and for the design of our Integrity system we have made use of this Guide.

## Legal Framework

ICCO is a member of Partos and a member of the Dutch Relief Alliance and is a beneficiary of the Dutch Ministry of Foreign Affairs.

In addition, ICCO is certified and has the recognition from the CBF (Central Bureau Fundraising) and holds the ISO/Partos 9001 certificate.

Therefore, we need to be compliant with the following standards:

1. DRA Integrity Guidance note (Feb. 2019) with the PSEA Minimum Operational Standards deriving from CHS(Core Humanitarian Standards);
2. Partos Code of Conduct and ISO/Partos 9001: 2015, version 2018 - Sector-specific application;
3. CBF integrity clauses from CBF Regulation.

## Code of Conduct

A Code of Conduct defines required behaviour of staff and explicitly defines forms of behaviour that are considered unacceptable by the organization.

ICCO has adopted the Code of Conduct of ACT Alliance<sup>1</sup>, of which ICCO is a member. It applies to all the work performed by all ACT members.

All staff are made aware of the Code of Conduct when joining the organization, and sign for acceptance when they sign their employment contract. The Code of Conduct is also an annex to every contract with consultants and partner organisations.

*Excerpt from the ACT Code of Conduct:*

**The [ACT Code of Conduct \(2016\)](#) defines the following standards of behaviour:**

To uphold and promote the highest ethical and professional standards, staff shall at all times:

- a. respect and promote fundamental human rights without discrimination and act with integrity;
- b. respect and abide by national and international laws;
- c. Treat all communities the ACT Alliance seeks to assist (including crisis-affected populations, internally displaced persons and refugees), fairly and with respect, courtesy, dignity and according to international laws and standards;
- d. positively represent the ACT Alliance;
- e. maintain an environment that prevents misconduct and promotes the implementation of this Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment;
- f. promote safe and confidential reporting of serious concerns about suspected misconduct following ACT Alliance guidelines;
- g. report immediately any knowledge, concerns or substantial suspicions of breaches of this Code of Conduct following ACT Alliance guidelines or to her/his line manager. Be aware that failure to disclose or knowingly withholding information about any reports, concerns or substantial suspicions of breaches of this Code of Conduct constitutes grounds for disciplinary measures;
- h. cooperate when requested with any investigation into alleged breaches related to this Code of Conduct.

Any breach of the Code of Conduct is a form of misconduct, and, if substantiated, will lead to disciplinary measures up to and including termination of employment and/or legal action if required.

## Overview of ICCOs Integrity System

The integrity system has two pillars and four related components:

MORAL LEARNING PROCESS	COMPLIANCE PRACTICE
<p><b>Moral judgement</b></p> <ul style="list-style-type: none"> <li>- Training of new staff in moral judgment in preparation for participating in moral deliberations</li> <li>- Organize and lead structural, periodical moral deliberations in every department/team</li> <li>- Documentation of moral deliberation -</li> </ul>	<p><b>Preventive cycle</b></p> <ul style="list-style-type: none"> <li>- Setting and sharing the standard: the Code of Conduct</li> <li>- Assess the vulnerability of process and functions and investigate/analyse the risks</li> <li>- Mitigate the risks (redesign processes; develop and implement preventive policies per</li> </ul>

<sup>1</sup> ACT Alliance is a global alliance of more than 145 churches and related organisations working together in over 120 countries to create positive and sustainable change in the lives of poor and marginalized people.

preparation of archive of cases	violation type)
<b>Moresprudence</b> <ul style="list-style-type: none"> <li>- (Re)define the mission statement</li> <li>- (Re)define the guiding principles</li> <li>- (Re)define the core moral dilemmas</li> <li>- Warn about mission drift</li> <li>- Warn about mission overdrive</li> </ul>	<b>Repressive apparatus</b> <ul style="list-style-type: none"> <li>- Reporting system (with 3 entry points) for internal and external reports</li> <li>- Preliminary investigation and decision about next steps: <ul style="list-style-type: none"> <li>- restorative justice</li> <li>- disciplinary investigation</li> <li>- punishment and overview of jurisprudence</li> </ul> </li> </ul>

### Three Clusters of Integrity Violations

The system covers three clusters of integrity violations

- Violations involving *misuse of power*: corruption, conflicts of interest and partiality, divulgence of confidential information, culpable negligence;
- *Financial violations*: fraud, theft, misappropriation of property or services, deliberate wastage;
- *Interpersonal violations*: discrimination, intimidation, humiliation, violence, bullying, unwanted intimacy, sexual intimidation, sexual violence

### Responsibilities

- ICCO's Executive Board holds the final responsibility for all issues related to Integrity in ICCO.
- ICCO's Integrity officer is responsible for the set-up and maintenance of the Integrity system and for reporting on the functioning of the system to the chair of the Executive Board.
- The Person of Trust can be the initial point of contact for reports of suspected integrity violations.
- The Integrity Focal points support the Integrity officer in the Regions. They may also serve as Person of Trust in the Region.
- Various internal specialists (fi HR officer, Legal Officer, Controller) support the Integrity officer in the implementation of the Integrity system.
- ICCO's management has an important role in both receiving reports of suspected violations and in promoting preventive measures and moral learning.
- All ICCO staff have a responsibility to comply with our Code of Conduct and to follow the measures as described in the Integrity system below.

### Funding

Funding for salaries (Integrity officer and Integrity focal points) and activities related to ensuring integrity in ICCO's program management and implementation has to be secured from

program budgets. This means that donor budgets should include budget items to cover Integrity related costs.

# ANNEX 1 - ICCO INTEGRITY SYSTEM

## Index:

1. Repressive Apparatus
2. Preventive Cycle
3. The Moral Learning Process
4. Zero Tolerance
5. Programme Participants, Target Groups, Communities and Chains
6. Communication

## Definitions:

- a. ACT Alliance = ACT Alliance is a coalition of 151 churches and faith-based organisations working together in over 125 countries on development and humanitarian aid.
- b. PSEA = Protection against Sexual Exploitation and Abuse
- c. SEA = Sexual Exploitation and Abuse
- d. Staff/employees: includes interns and volunteers unless stated otherwise
- e. Consultants and partners are third parties who receive and sign a contract which includes Integrity and the Code of Conduct

## 1. Repressive Apparatus

### 1.1 Code of Conduct

ICCO has adopted the [Code of Conduct of ACT Alliance \(2016 version\)](#), of which ICCO is a member. This Code of Conduct explicitly defines forms of behaviour that are considered unacceptable and therefore constitute a disciplinary offence.

### 1.2 Types of Integrity Violations

The Code of Conduct covers three clusters of integrity violations:

- Violations involving *misuse of power*: corruption, conflicts of interest and partiality, divulgence of confidential information, culpable negligence;
- *Financial violations*: fraud, theft, misappropriation of property or services, deliberate wastage;
- *Interpersonal violations*: discrimination, intimidation, humiliation, violence, bullying, unwanted intimacy, sexual intimidation, sexual violence

### 1.3 The Person of Trust - First Line Care

The reporting system has an initial point of contact: the designated person of trust (in Dutch: vertrouwenspersoon). The role of the person of trust is to provide first-line support to any

member of staff who has been the victim of, or witness to, a violation. All conversations with the person of trust are held in the strictest confidence.

A conversation with a person of trust can have several aims:

- it is an opportunity for the employees concerned to tell their story; the conversation will then seek to clarify the nature of that issue
- next step is to determine the appropriate follow up actions
- referral of the employee to:
  - the reporting systems for violations
  - HR in connection with an employment conflict
  - a moral deliberation in the case of protest or dilemma
  - HR for assistance such as victim support or coaching
- at the request of the employee, the decision can also be made not to take further action.

A person of trust is an internal staff member.

As ICCO has many offices, one in the Netherlands (GO) and multiple in the Regions where we work, it is good to appoint multiple persons of trust so there is always a person of trust accessible for staff closeby.

In GO, at least one person -but preferably two- will be appointed as person of trust. Because of Dutch regulatory requirements, for GO there is also an external Person of Trust.

In the RO's at least one person per region- but preferably more (in each larger country office), will be appointed as person of trust.

The persons of trust of ICCO are to be appointed by the Executive Board (of Global Office) or the Regional Manager (in the RO) taken into account the asked nominations for this role by the staff.

#### **1.4 The Integrity Officer and Integrity Focal Points.**

The Executive Board appoints one or more Integrity Officers in the Global Office in The Netherlands (specialist on the three types of violations). Next to that, the Regional Manager in each appoints one or more Integrity Focal points in each Regional Office of ICCO. The role of Integrity Officer and Integrity Focal Point can be a part-time role for a HR manager, for someone in the legal department, in the finance department and/or safety and security. Competences of a staff member are more important in the appointment of this role, than the formal function.

- The Integrity Officer and Integrity Focal Points take part in a learning community alongside counter-parts from other organisations in the sector and receive regular training on integrity/PSEA.
- The Integrity Officer and Integrity Focal Points will report annually to the Executive Board together on its progress on the implementation of the Integrity Policy and procedures and the maintenance of the integrity system in a wider sense.
- Staff members dealing with integrity/PSEA have formalised responsibility for integrity/PSEA in their job description, performance appraisal or similar.
- The time committed to integrity/PSEA is in proportion to the scale of implementation required under the current situation of the organisation and will be set annually.

## 1.5 Reporting System - Three Channels

The reporting system of ICCO has three channels through which violations can be reported by victims or by witnesses (= whistleblower):

### ***Channel 1: Management***

- Violations can be reported through the management of ICCO.
- This can be the employee's own line manager or regional manager or the manager of another department or region.
- When an integrity violation is reported to management, it is not possible to protect the identity of the person making the report. Every manager is required to forward the report to the designated director with responsibility for integrity issues. Within ICCO the Chair of the Executive Board is appointed as the designated director.
- The manager also informs the Integrity Officer.

### ***Channel 2: Integrity Officer and Regional Integrity Focal Points***

This is the 'internal' reporting point in the sense that it is set up by the organisation itself.

- The EB has appointed one or more Integrity Officers in the Global Office in The Netherlands and an Integrity Focal point in each Regional Office of ICCO.
- Violations can be reported directly to the Integrity Officer (either by the victim or by a witness/whistleblower) or - in the region - to the Regional Integrity Focal Point. In this case, it is possible to protect the identity of the person making the report.
- The Integrity Officer has a separate email address and telephone number so that the Integrity Officer can be contacted by anyone wishing to report an integrity violation, whether that is a member of the organisation's own staff or an external party such as a volunteer, member of the target group, partner, etc.

### ***Channel 3: External***

- Report can be made to an independent body via the [ACT Alliance Complaints Policy](#). See further ([www.actalliance.org/complaints](http://www.actalliance.org/complaints)).
- The ACT Alliance Complaints Policy is placed on our website and communicated to our staff as a third channel of reporting.
- The point of entry is the Complaints Focal Person at the ACT secretariat in Geneva, Switzerland in the English language, via 3 channels (by letter, by email, to [complaintsbox@actalliance.org](mailto:complaintsbox@actalliance.org)) or by phone call or text message).
- A sample complaint letter format is added to the Policy as annex.

## 1.6 Who Can Report?

In addition to employees of ICCO, it is also possible for other stakeholders such as beneficiaries (programme participants), volunteers, the staff of organizations in the chain and others to report any suspected integrity violation.

A reporting person can be object/victim of the violation or witness of the violation of the Code of Conduct.

In addition to statements by victims or witnesses, reports of integrity violations can also be the result of internal controls. An audit, for example, may reveal evidence of a financial violation.

This sort of control based report is always made through the management channel and the Integrity Officer is always informed.

*In programs of ICCO (in consortia, with other NGOs and local partners)*

It is ICCO policy that in our programs - most of the time in consortia, together with other NGOs and local partners - we participate in community based complaint mechanisms (CBCM) that are jointly developed and implemented by the aid community and adapted to the specific locations. This is laid down in ICCO's [Program management checklist \(QM P2.1\)](#) and [Toolkit \(QM P2.1a\)](#) and includes:

- guidance provided to the field on how to design the CBCM to ensure it is adapted to the cultural context with a focus on community participation.
- a mechanism for monitoring and review of the complaint mechanism.
- written guidance on the provision of victim assistance.

## 1.7 Investigation Procedures

### **Preliminary investigation**

- A report of a violation/complaint is form-free. However, there is a suggested complaint/report letter format which can be used; see Annex 3.
- When the Integrity Officer receives a report (through any of the three channels) (s)he will launch a preliminary investigation, the purpose of which is to determine whether a disciplinary investigation is warranted or whether some alternative action will be more appropriate. First question is whether there is a possibility of a violation. She will assess the strength of the evidence and look for an indication that the allegation is unfounded. Further, she will assess whether the severity of the alleged offence and the appropriate disciplinary action/punishment will justify the cost (including reputational damage) of a full investigation.
- When an Integrity Focal Point receives a report (through any of the three channels) (s)he will launch a preliminary investigation just like described above as the Integrity Officer. The IFP will discuss the preliminary investigation with the regional manager and do the assessment together, unless the regional manager is subject/involved in the case. Then the IFP seeks advice from the Integrity Officer in Global Office and do the assessment together.

### **Investigation**

- If the Integrity Officer or the Integrity Focal Point together with the RM and Integrity Officer decide that an investigation is warranted, (s)he will advise the Executive Board accordingly. Her proposal will include the findings of the preliminary investigation, nominate persons (internal or external) to undertake the investigation and, where appropriate, state the required budget. It will also sets out the terms of reference and the questions to be answered by the investigation.
- Where the Integrity Officer does not conduct the investigation herself- in case of complex cases-, but instructs others (internal or external) to do so, she will nevertheless oversee the process. She will monitor progress and the budget, assess the quality of the work and products, and require the investigators to account for their methodology and conclusions.

- Once the investigation has been completed, she will present the final report to the Executive Board of ICCO, accompanied by her own conclusions and recommendations. All investigations (whether internal or external) must be conducted according to the complaints procedure (annex 2) and the investigation protocol (annex 4) that establishes the rights, responsibilities and authority of the investigators while also protecting the rights of all parties.

### **No investigation is conducted**

The preliminary investigation may conclude that a full investigation is not warranted. However, this does not mean that no further action will be taken. It may be appropriate to conduct a risk analysis or a reconstruction in order to draw lessons for the future. Forms of restorative justice may be applied to mitigate the injury, loss or damage suffered by the victim.

### **Disciplinary action/sanctions**

- Action which constitutes a criminal offence must always be reported to the competent authorities (often but not always parallel to an internal investigation).
- If the investigation concludes that an employee has indeed committed an integrity violation, a recommendation regarding the appropriate disciplinary action/sanction will be produced by an external or internal (HR or legal) specialist. This person must take account of case law in order to ensure the proportionality and consistency of disciplinary actions. The recommendation is then submitted to the Executive Board. The Executive Board makes the final decision with regard to the imposition of any disciplinary action/sanction.
- Sexual exploitation and abuse (SEA) is explicitly stated as grounds for discipline which may result in termination of the (employment) contract.

## **1.8 Aftercare**

Victims/survivors of inappropriate behavior are entitled to medical and psychosocial support and other assistance, provided in a timely, effective, dignified and compassionate manner.

## **2. Preventive Cycle**

### **2.1 Setting the Standard: the Code of Conduct**

As mentioned under section 1.1 ICCO has adopted the Code of Conduct of ACT Alliance.

This Code of Conduct describes expected standards and unacceptable behaviour and as such is the first piece of the preventive cycle.

The Code has been shared with all staff and with contracting partners and staff receive induction and refresher training covering ICCO's Integrity policy and procedures and the Code of Conduct (see 6. Communication below).

The repressive apparatus described above will also have a preventive effect as it will show that violations of the standard will be noticed and sanctioned.

## 2.2 Prevention via HRM

- ICCO makes sure that all selected candidates sign the code of conduct as part of being offered a contract (see 2.1)
- ICCO commits to improving its system of reference checking and vetting for former misconduct. A screening policy with regard to recruitment and selection procedures will be developed; reference checks with at least the latest employer will be part of this policy and also a written self-declaration.
- Supervision and performance appraisals include adherence to participation in Code of Conduct trainings (or similar) that includes Integrity and PSEA.
- Job adverts include Integrity commitments
- Questions related to Integrity asked during interview.

## 2.3 Vulnerability of Processes and Functions / Risk Analysis

In order to design and implement an effective preventive cycle, ICCO has to have insight in the integrity related risks and vulnerabilities in our processes and functions.

The Integrity Officer, in consultation with integrity focal points and management, is responsible for producing and evaluating an analysis of vulnerabilities and risks in all processes and functions and for all types of violations.

- First step is the development of a plan for this analysis with advice from the quality auditor. A quickscan will result in an overview of processes and functions and the violation types that are expected to be higher risk and lower risk. This will be the basis for a three year plan to conduct the analysis of vulnerabilities and risks. The Integrity officer will present this plan to the Executive Board for Approval.
- The next step is implementation of the three year plan for the analysis of vulnerabilities and risks of all processes, functions and violation types. The [Integrity System Guide produced by Partos/Goede Doelen Nederland](#) contains guidance on how to conduct the analysis of vulnerabilities and risks.
- Once the three year plan has been implemented, a new analysis cycle will start so that the analysis of vulnerabilities and risks stays up to date

## 2.4 Risk Reduction and Mitigation (Including Prevention Policy)

Based on the outcome of the risk analysis, the Integrity Officer will prepare recommendations for preventive actions to the Executive Board. After approval, the management/process owner is responsible for implementing the preventive measures, under the supervision of the Integrity officer.

Actions can be in the area of training, redesigning processes, reassigning responsibilities and/or tasks etc.

Based on the risk analysis, for each type of violation (see 1.1 above) a prevention policy will be prepared or fine tuned. This ensures that the prevention policies remain relevant in changing circumstances (internal or external developments). These policies/policy adjustments will be

prepared by the Integrity officer and approved and communicated to all staff by the Executive Board.

Effectiveness of the mitigation measures will be shown in the next cycle of risk analysis and by the annual integrity report prepared by the integrity officer.

### 3. The Moral Learning Process

ICCO's moral learning process consists of the following elements:

- ICCO builds and maintains a moral learning process.
- In order to support the moral learning process the moderators of moral deliberations ICCO (to be appointed: e.g. managers, Integrity Officer and /or Integrity Focal Points) are trained in moral judgement and to assist in the development of moresprudence.
- First, ICCO will run a pilot for the **moral judgement training**.
- The Integrity Officer will develop a plan whereby everyone in the organisation receives training. This training takes up at least one full day and is given in small groups of no more than twelve people. Ideally, those groups will be made up of colleagues who work together on a daily basis. This plan is then submitted to the Executive Board. Depending on the size of the organisation, the entire process could take several years.
- In departments where all staff have completed moral judgement training, moderators are selected and trained in their role, whereupon the regular **moral deliberations** are established. These take place periodically in every department/region/team.
- Reports of the moral deliberations are collated.
- The Integrity Officer and/or management can make proposals for the development of specific moresprudence, perhaps coordinated with the thematic deliberations. Proposals are submitted to the Executive Board.
- Moresprudence: If the organisation documents the cases and discussions of the moral deliberations, and collects these reports together, the basis will be set for developing moresprudence, that is for authoritative, directive and corrective morel. Moresprudence includes the organisation's mission statement, guiding principles, Code of Conduct, core dilemmas, and the moral risks of 'mission drift' and 'mission overdrive'. The Integrity Officer will develop a platform for the managers and integrity focal points where cases and moresprudence can be shared for learning.
- The Integrity Officer will notify management of any signs of mission drift or mission overdrive.

#### Content training

The training is in two parts. The first part allows participants to question whether actions and decisions are in accordance with justice. Any misconceptions concerning the concept of 'justice' are resolved and a broad working definition of the term is formulated.

In the second part, the participants learn a method that enables them to assess whether their own intended decisions are in accordance with justice. The crux of this method is a careful weighing of the

rights and interests of all stakeholders who will be affected by the decision. It is this conscientious and precise consideration which ensures that the decisions and actions which follow are indeed in accordance with justice.

### **Moral deliberation**

Once all managers and staff of ICCO have been trained, ICCO sets up a system of moral deliberation: existing teams will meet regularly to discuss the non-trivial moral decisions that arise during their work, through a moral judgement investigation.

There are three forms of moral deliberation:

1. **open deliberation** - several times each year -Any decision that has arisen during the team's work can be proposed and developed into a moral judgement. Two or three such decisions will be selected and investigated.
2. **thematic deliberation** - A thematic moral deliberation meeting is always convened by the Integrity Officer and/or management. It examines specific cases which have a common theme, usually prompted by concerns about a particular aspect of the organisation's work. The primary purpose of these meetings is to produce specific moresprudence.
3. **incidental deliberation** - An incidental moral deliberation meeting can be called by anyone within the organisation who is having difficulty with a certain decision. Such meetings are usually more informal in nature. They are attended by a smaller number of people, do not have a chair or ethicist to provide support, and there will usually be no written report. An incidental moral deliberation meeting can be of great value in assessing the moral correctness of urgent decisions that cannot wait until the next open meeting.

## **4. A Note on Zero Tolerance**

ICCO is committed to the highest possible standards of openness, transparency and accountability and as part of the ACT Alliance ICCO promotes a culture of honesty and zero tolerance towards fraud and corruption and other integrity violations.

Note: Zero Tolerance does NOT mean that any integrity violation automatically results in dismissal of the perpetrator. As described in this procedure, if after investigation a violation is confirmed, appropriate measures will be taken that are in line with the nature of the violation. Zero tolerance DOES mean ICCO promotes a culture where the shared moral is that integrity violations are not acceptable.

## **5. Program Participants, Target Groups, Communities and Chains**

### *a. Program participants, target groups, communities*

Like other organisations, ICCO experiences the problem that programme participants (patients, students, donors, etc.), their families and communities make little or no use of the existing reporting channels. Given their high degree of dependence, they are at greater risk of becoming a victim of an integrity violation.

-> Therefore the first priority should be to ensure that access to reporting channels is improved for all participants.

### *b. Chain*

ICCO often works as part of a chain of partners who jointly undertake a project or programme. The partnership arrangements can take many different forms. There may be a local partner charged with the actual implementation of a project that has been set up and financed by ICCO. Perhaps several international organisations work together, pooling their resources to provide humanitarian aid in response to a disaster.

-> The basic principle when dealing with integrity issues within the chain is that **everyone is jointly responsible**. There must be no 'passing the buck' or hoping that someone else will take action. The best way of responding to an issue is often a practical question, and sometimes one of legal jurisdictions. When seeking solutions, the sector- wide learning community will be valuable.

## 6. Communication

In all specific cases of (alleged) integrity violations, the interests of due process and victim support must always take priority over those of communication.

### 6.1 Communication of the Policy, Code, Procedures and Reporting Mechanisms

The Executive Board together with the Integrity Officer and Integrity Focal Points ensure that:

- All staff have received and signed a hard copy of the Code of Conduct as attachment to their employment contract.
- The Code of Conduct is annex to every contract with consultants and partner organisations.

Special attention is asked for consultants in asking attention for and discussing this CoC as they are considered high risk. In addition, all contracts with partners/suppliers/contractors include clauses on PSEA.

- Procedures are in place to receive written agreement from entities or individuals entering into cooperative arrangements with the agency that they are aware of and will abide by the standards of the Code of Conduct including the PSEA policy.
- The Code of Conduct, the three channels of reporting violations and the Complaints & Investigation protocol are published on our website and internal portal (Kumulus);
- The content of ICCO's Integrity policy, standards of our Code of Conduct, procedures and the mechanism to file complaints and reports of misconduct including the names and responsibilities of both the Integrity Officer and the person(s) of trust and the implications of breaching these standards have been conveyed to current staff and senior management (at all offices) on repeated occasions via:
  - induction training new staff
  - refresher trainings (annual)
  - discussions in teams with staff and manager in the context of moral learning process: see chapter 3

### 6.2 Transparency - Obligations to Report as ICCO Towards Third Parties

In addition to ICCO's own communication and transparency standards, ICCO is also under the following reporting obligations. The Integrity Officer ensures that these reports are made according to the relevant standards.

### **Annual Report**

ICCOs corporate annual report must contain information about:

- the way in which implementation of our Integrity System is carried out;
- the number and nature of reports of violations and their handling;
- a reflection on our integrity policy.

### **Dutch Ministry of Foreign Affairs as donor**

ICCO has an obligation to report any incident related to inappropriate behaviour to the Dutch Ministry of Foreign Affairs (MoFA).

Reporting of SEA incidents should be done when there is a suspicion of severe (sexual) misconduct or any other form of severe inappropriate behavior. Reporting can be done with the first complaint, or at least when the organisation has started an investigation on possible misconduct, as stated in the letter by MFA (16-05-2018 ref: 2018.598346). See also the [DRA Integrity Guidance Note](#) for specifics regarding reporting on SEA incidents that occur in DRA activities and events at NL level (form, what, to whom, etc.).

### **Other Donors**

Most donors require that ICCO reports any incidents related to inappropriate behaviour. Details are available in the funding contracts.

### **CBF**

ICCO has an obligation to report any incidents related to inappropriate behaviour towards the CBF, using the first report form and final report form (progress report Inappropriate behaviour) see annex 3, via email address: [integriteit@cbf.nl](mailto:integriteit@cbf.nl).

### **In general- communication on the long term**

- a. Report on the progress made in developing an effective integrity system. Information about progress frames all other communication.
- b. Communication must make clear that having a better integrity system will eventually lead to fewer violations, although at first there is likely to be a greater number of reports. If this is indeed the case, the organisation should present the increase in a positive light.
- c. The central tenets of all communication about integrity must be 'truth' and 'justice'. This entails that the organisation must not exaggerate the progress it has made and must report its setbacks and problems as fully as it does its successes.