



Integrity policy Edukans

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Versions

Date	Version	Adjustement
17-11-2020	0.1	First draft of integrity policy.
08-12-2020	1.0	Document extended.
10-01-2021	1.1	Document created and expanded.
29-03-2021	1.2	Draft finalized and discussed in MT.

1. Introduction

Edukans, together with its partners, supports or implements educational development and advocacy programmes for vulnerable people in more than 15 countries around the world. While doing this, Edukans aims for high integrity standards in its contact with beneficiaries, partners, suppliers, clients and among Edukans staff. Staff of Edukans are personally and collectively responsible for upholding and promoting the highest ethical and professional standards in their work. Edukans realises that the success of her mission and strategy, as well as their results, depends on her relationship with stakeholders and on the integrity of the organisation itself.

Definitions

1. Edukans: Edukans Foundation, with offices in The Netherlands, Ethiopia, Kenya, Malawi and Uganda
2. Staff: Refers to but is not limited to all permanent and temporary staff, their 'dependents' (as defined in this document), interns, consultants, observers, volunteers, and all individuals working for or representing Edukans.
3. Reporter: the person who formally reports a (suspected) violation.
4. Manager: the one who directly manages the reporter
5. Confidential adviser: the person who has been appointed as confidential adviser to act as such for Edukans.
6. Integrity officer: the person who has been appointed as responsible for managing the integrity policy.
7. Supervisory Board: The Supervisory Board supervises the Edukans policy and the general course of events.

2. Purpose and scope

The main purpose of this Integrity policy is to promote greater accountability and outline key responsibilities of those involved. The following standards apply to all staff, including but not limited to all permanent and temporary staff, their dependents, interns, consultants, observers, volunteers, and any other individuals working for or representing Edukans. Through signing contracts or agreements, we ensure that all these individuals and organisations are aware of the set standards.

This integrity policy aims to protect all staff as well as every community member whom Edukans seeks to assist, from integrity violations. All staff must be mindful that each action in the respective context can have repercussions for others.

3. What is integrity?¹

Integrity cannot be guaranteed just by drawing up a number of rules of conduct. Attitude and "wanting to do things properly" are also important aspects of integrity. But how is this common attitude realised? This integrity policy focuses on greater accountability and key responsibilities of those involved. Herein, the core values of Edukans (trust, hope and commitment) are the fundamental idea. These values underpin Edukans' vision of good education and also form the starting point for the organisation's culture, working methods and identity. These values also guiding our personnel policy.

An organisation may be said to show integrity if it acts in accordance with justice at all times. This means that it must do right by the people and organisation with and for whom it works. An organisation that operates with integrity is one that does right by all her stakeholders.

Integrity consists of two aspects. On the one hand, integrity is based on rules and regulations, both internal and external.

On the other hand, it includes the organisational culture at Edukans, the attitude and willingness to do the right things and in the right way. Integrity in an organisation means that people treat each other with

¹ Source: Partos/Governance&Integrity International/Goede Doelen Nederland, Integrity System Guide

openness and respect, avoid deception and that the management sets a good example through exemplary behaviour. In addition to the content of the integrity policy, Edukans employees are obliged to comply with legal regulations and common social standards and values.

Integrity violations can be categorized as follows:

- 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, sexual harassment (sexual) intimidation, (sexual) violence.

Apart from the fact that we are aware that these issues may occur everywhere and therefore also in our organisation, there are some integrity risks that can be distinguished because of the type of organisation we are and the type of work we do. For example, we work with vulnerable people: we must be aware of the fact that someone that is working (on voluntary basis) for Edukans might cause harm to our target group, unintended or intended. Also, we work in different cultures: we must be aware of the fact that it differs per context what is considered as appropriate. Sometimes, our interventions might even be in conflict with local culture or law, like SRHR education. Therefore, we defined several integrity risks specifically for Edukans:

- We work with data from individual donors and we use images/videos of our target group for communication purposes (GDPR risks);
- The sector in which we work makes both us and other organizations in the sector vulnerable to image damage;
- We are vulnerable to (unintentional) unethical behaviour due to the cultural differences between the countries in which we work: behaviour we do not consider as inappropriate, might be considered inappropriate in other countries or the other way around;
- We are vulnerable to (unintentional) unethical behaviour due to our commitment to a vulnerable target group: unintended unethical behaviour is sometimes recognized too late and intended unethical behaviour might take place more easily when a potential victim is vulnerable;
- We work with many partners and volunteers who represent us and any unethical behaviour affects our target group and the image of Edukans;
- Part of our work consists of project financing which creates a risk of fraud;
- People are always unconsciously biased and this risk increases when there are more differences between people because different cultural backgrounds.

4. Instruments to prevent integrity violations from happening

In order to prevent integrity violations from happening, we follow external and internal rules and regulations, and we make use of instruments that make integrity more open to discussion. Where applicable, relevant laws and regulations apply, such as the Working Conditions Act and the Criminal Code and similar laws in Edukans' focus countries.

Internal rules and regulations have their basis in several policies. These policies explicitly define forms of behaviour that are considered unacceptable and therefore constitute a disciplinary offence. Staff have the right to know in advance what types of conduct will lead to disciplinary action which could lead to punishment. Edukans uses the following policies to prevent integrity violations from happening:

1. Code of Conduct
Policy for the prevention of misconduct, including corruption, fraud, exploitation and abuse, including sexual harassment; and to ensure child safeguarding
2. Child Protection Policy
3. Corporate Social Responsibility Policy
4. HR manual

In addition to or as an elaboration of articles from the collective labour agreement (CAO) and the Code of Conduct, manuals and procedures (accessible to all employees) have been drawn up. Safety & security policy

5. Certificate of Conduct (in Dutch: Verklaring Omtrent Gedrag (VOG))
6. Privacy statement/addendum protection of personal data and privacy
7. Employment and volunteer contracts

Edukans uses the following instruments to make integrity more open to discussion and that help to build an organizational culture with more awareness on integrity issues:

8. Interview form performance review
9. Moral deliberation. An incidental moral deliberation meeting can be called by anyone within the organisation who is having difficulty with a certain decision. In this case, the following steps should be followed:
 - Formulate the dilemma
 - Name the stakeholders
 - Quick scan of legislation and regulations
 - Collect arguments
 - Weigh arguments (distinction between principal arguments, opportunity arguments?)
 - Make moral choice, limit damage

5. Procedure in case of integrity violations and responsibilities of the persons involved

Report of a (suspicion) of an integrity violation

When making integrity a topic more open to discussion, we expect that (suspicions of) integrity violations will be reported more often. Apart from the organisation's own employees, it is possible for clients, our 'target groups', volunteers and the staff of other organisations in the chain to report any (suspected) integrity violation.

We expect our staff to:

- Sign our Code of Conduct and behave as such
- Report (a suspicion of) an integrity violation through one of the channels as mentioned in this policy

In case there is (a suspicion of) an integrity violation, when possible, it is good to first try to solve an integrity violation with the person(s) directly involved. In case this is not possible, for example due to the nature of the violation, there are several options through which violations can be reported by victims or witnesses, external or internal. Primary responsibility for the integrity at Edukans rests with the management. Next in line is the supervisory body, followed by our staff. At Edukans, the integrity officer is authorised to carry out all practical activities that are necessary to ensure that all requirements are met.

Portal of reports

Complaints of an external reporter can be reported to our Integrity officer via integrity@edukans.nl.

Handling and investigation of a certain report will be done in the same way as an internal report.

The gateway to reporting concerns as an employee of Edukans is a report to the confidential adviser. In response to a report to the confidential adviser, the person in question may decide not to make an official report of (suspected) malpractice. The role of the confidential counsellor is therefore to be a discussion partner for the person who is thinking about making a report. The confidential adviser is then likely to refer to one of the other channels, unless it is a case of interpersonal violation. He/she is not obliged to report if the person reporting does not wish to do so. The confidential adviser has the following tasks:

- Acting as a listening ear: point of contact and taking care of the first reception of employees who witness a (suspected) violation concerning interpersonal violations (as defined above), have questions about this or experience dilemmas in this respect;
- Acting as an adviser: advising the reporter by asking questions to unravel the report together with the reporter. They also advise on the way in which the reporter can bring up the report within the organisation. In consultation with the notifier, it can be discussed in what way the confidential adviser can be helpful in raising the issue of a (suspected) breach and in submitting a formal report.
- Counselling the person reporting, if desired, in bringing up a violation or suspicion of a violation with the integrity officer, director or Supervisory Board
- Monitoring and providing aftercare: the confidential counsellor provides adequate aftercare to the reporter. The confidential adviser identifies whether the reporter is experiencing negative consequences for his/her functioning within Edukans as a result of the report and can refer him/her to HR for assistance (including victim support or coaching).

If the person in question decides to make an official report, four channels are available for this purpose:

Channel 1: Management

The first channel through which violations can be reported is the MT. This may be the employee's own manager, the manager of another team or the director. When an integrity violation is reported to management, it is not possible to protect the identity of the person making that report. Every manager is required to forward the report to the director, as the director is ultimately responsible for integrity.² The manager should also inform the Integrity Officer.

In addition to statements by victims or witnesses, reports of integrity violations can also be the result of internal controls, like internal or external audits. For example, an audit 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. Also, a complaint handled through the complaint's procedure will be discussed by the management in case of a large (>3) number of complaints on a specific topic within 1-3 days.

Specific tasks of the managers are:

- Is informed in the reporting process by the integrity officer or director if it benefits the process.
- Assisting the reporter in the process if the report is received by the manager.

Specific tasks of the director are:

- Informing the chairman of the Supervisory Board of a report received, only if the director sees reason to do so.
- Initiate an investigation and, if necessary, call in an external investigator.
- Discuss the results of the investigation and inform the chairman of the Supervisory Board about the results and the next steps, if the director sees reason to do so.

Channel 2: Integrity Officer

The second channel is that of a direct report to the integrity officer. In this case, it is possible to protect the identity of the person making the report. Specific tasks of the integrity officer are:

- Making a written record of a report and having it signed for approval by the reporter.
- Registering and reporting on all incoming reports.
- Informing the director of a report.
- Initiating moral deliberation and thereby intensifying awareness.
- Guaranteeing the anonymity of the reporter in the reporting process.
- Supervising the process: from report to punishment.

Channel 3: External

The third channel is external, whereby the report can be made to an independent body such as the

² In case the report concerns the directors' behaviour, the report must be done to the Supervisory Board.

[Whistleblowers Authority](#). This makes it possible for the person reporting to report a violation if (s)he has no confidence in management or the internal Integrity Officer. Reporting to the Whistleblowers Authority is anonymous and guarantees that persons from outside our organization and persons affiliated or employed by Edukans can report alleged irregularities without endangering their position. This often concerns serious misconduct and is applicable in the following cases:

1. **Suspected malpractice:** the suspicion of an employee that there is malpractice, within the organization in which he works or has worked or at another organization if he has come into contact with that organization through his activities, insofar as:
 - a. the suspicion is based on reasonable grounds, arising from the knowledge that the employee has acquired from his employer or from the knowledge that the employee has acquired through his work at another company or organization, and
 - b. the social interest is at stake in:
 - i. the (imminent) violation of a statutory regulation, including an (imminent) criminal offense,
 - ii. an (imminent) danger to public health,
 - iii. an (imminent) danger to the safety of persons,
 - iv. an (imminent) danger of damage to the environment,
 - v. an (imminent) danger to the proper functioning of the organization as a result of improper actions or omissions,
 - vi. an (imminent) violation of rules other than a legal provision,
 - vii. an (imminent) waste of government funds,
 - viii. (a threat of) knowingly withholding, destroying or manipulating information about the facts referred to under i to vii above;
2. **Suspicion of an irregularity:** a suspicion based on reasonable grounds of a deficiency or injustice of a general, operational or financial nature that takes place under the responsibility of the organization and is so serious that it falls outside the regular work processes and exceeds the responsibility of the direct supervisor.

The specific tasks of the Whistleblowers Authority are:

- Receiving a report and identifying the causes of the reporter's need to report externally
- Assessing and discussing alternatives to lift the (suspected) breach directly or indirectly or to have it lifted
- Advising and assisting the reporter in raising a violation or suspicion of a violation other than with the director or the Supervisory Board, for example with an external investigation agency
- In case of a report to the Whistleblowers Authority, the [Whistleblowers Procedure](#) comes into force.

Channel 4: Chairman Supervisory Board

A report can be made to the chairperson of the Supervisory Board; only if the report concerns the Edukans director. In that case, the chairman of the Supervisory Board has the following tasks:

- Receiving a report if the director himself is the subject of a suspicion of malpractice.
- Inform the director of the report (not the content).
- Initiate an investigation in consultation with the integrity officer and, if necessary, call in an external investigator.
- Discuss the results of the investigation in the Supervisory Board and inform the director about the results and the next steps.

Investigation of a report

Preliminary investigation of a report

When the Integrity Officer receives a report (directly or through any of the other four 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.

The first question addressed by the Integrity Officer is whether there is a possibility of a violation. (S)he will assess the strength of the evidence and look for any indications that the allegation is unfounded. Finally, (s)he will assess whether the severity of the alleged offence and the appropriate disciplinary action/punishment justify the cost (including reputational damage) of a full investigation. In case of a severe alleged offence, this must be [reported](#) to the Netherlands Fundraising Regulator (Dutch: Centraal Bureau Fondsenwerving [CBF]) and, in case of a funding relationship, to the Ministry of Foreign Affairs.

Investigation

If the Integrity Officer decides that an investigation is warranted, she will advise the organisation's director 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 set out the terms of reference and the questions to be answered by the investigation. Where the Integrity Officer does not conduct the investigation herself 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 director accompanied by her own conclusions and recommendations. If the investigation is particularly complex, it will almost certainly be necessary to call upon external assistance. The choice of consultant or agency (and their geographical location) will depend on the nature of the alleged offence.

Investigation protocol

All investigations (whether internal or external) must be conducted according to a set protocol 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 disciplinary investigation is not warranted. However, this does not mean that no further action will be taken. In case it is appropriate, a risk analysis or a reconstruction will be conducted 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/punishment

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/punishment will be produced by an external or internal 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 director. The director makes the final decision with regard to the imposition of any disciplinary action/punishment.

All files on reports done will be kept 5 years.

Victim support

As a developmental organisation, we experience the problem that programme beneficiaries, 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 the victim of an integrity violation, particularly financial violations such as extortion or interpersonal violations such as sexual harassment.

In case Edukans itself does not have the in-house expertise to provide victims with adequate assistance, expertise will be sought for this purpose or reference will be made to specialized external parties, in the Netherlands as well as in our focus countries.

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. For example, information contained in a report made through the formal channels may not be divulged to anyone who is not directly involved in the preliminary investigation and any disciplinary investigation. Where possible and appropriate, the names of both the victim and the (alleged) perpetrator must not be made public. If the allegations are already public knowledge, or if rumours have been circulating, an outcome that exonerates the alleged perpetrator (who is found to be innocent) should be communicated in such a way as to restore their reputation to the greatest extent possible. Other stakeholders who could suffer reputational damage from an incident that is likely to attract wider publicity may be informed of the situation, on condition that they too undertake to prioritise due process and victim support. Communication concerning specific incidents demands careful moral deliberation about each individual case.

6. Assurance of integrity

Our integrity is safeguarded in:

The organisational structure and the Code for Good Governance in Fundraising Charity Organisations (Wijffels Code)

This code sets high demands on

- Separation of the functions of management and supervision;
- Openness and clarity of the organisation towards stakeholders (such as partner organisations in the South, members and donors, but also volunteers and institutional donors and society as a whole);
- the self-reflective and self-correcting ability of the organisation's directors and supervisors.

As a CBF accreditation holder, compliance with the Code of Good Governance is audited periodically by the Central Bureau on Fundraising. In addition, directors and supervisors must personally sign the CBF Declaration of Conflicts of Interest, Annex 12, and the annual accountability statement. We are also audited annually for compliance with the ISO 9001:2015 standard, in which integrity is an important component.

Regarding our volunteers, we are affiliated with the Association Volunteer Correct. This assures our volunteers that they can perform responsible volunteer work for Edukans.

Organisational culture

We are aware that all regulations and procedures are important but will only work if they are supported by an organisational culture of openness, transparency and a framework of values that guides them. And these values require concrete application in our conduct. Only then can integrity be developed into a living practice.

Edukans' core values are connected with our vision on good education and a sound personal development of young people. But we believe that these values can only be applicable if these values are practised also in our daily culture and identity as being a value driven organisation e.g. in our HR policy and our day to day work.

- Trust

Good education creates a safe, trustworthy environment. This creates the confidence for children and young people to develop and hold their own in their own environment. Many children and young people grow up in situations of insecurity and uncertainty. This is often a consequence of poverty, but prosperity is no guarantee for stable development. In order to grow in (self)confidence, it is important to gain insight into one's own identity, talents and possibilities. For this, education is needed that, in addition to knowledge development, focuses on personal development, skills and competences. The development of values is an important theme.

- Perspective

Good education contributes to the creation of opportunities and perspectives for the future. Therefore, the education has to be relevant for the target group and has to be closely connected to their world. Pedagogically speaking, perspective and hope mean that education offers a stimulating environment and promotes the vitality and strength of children and young people. Perspective is also closely linked to a religious, philosophical or spiritual dimension, a vision that stimulates expectation. Therefore, it is important for the formation of the personality that children can orientate themselves to their own source of inspiration and that of others.

- Involvement

Good education stimulates involvement, connectedness and responsibility. Solidarity with and involvement in others are fundamental values for personal development. Individual development is inextricably linked to others, near or far. This involves involvement in the immediate surroundings, but also in a broader sense: developing knowledge, interest and attention to global issues and other cultural and religious traditions and doing justice.

(Personnel) policy

- Recruitment & Selection

When hiring new employees, we ask as standard for the presentation of the original diplomas and identification documents

diplomas and proof of identification and we request a Certificate of Good Behaviour (VOG). We also ask new employees to sign the Code of Conduct.

- Induction programme for new employees

Employees are made aware of the personnel handbook and the quality handbook that contains all procedures and protocols relating to integrity.

When providing laptops, NS Business Cards, keys/passes and the like, employees sign a user agreement.

In addition, the online training course 'into integrity': <https://www.intointegrity.nl/> from Partos and Goede Doelen Nederland is compulsory for every Edukans employee.

- Performance appraisals

Integrity is a topic of conversation in the annual performance review.

Accountability

In the annual report of Edukans, we include the topic of integrity and we reflect on it. We report integrity incidents to the director and the Supervisory Board.

Awareness

To safeguard integrity properly, we must keep the subject alive. The subject is periodically (at least once per trimester) on the agenda of the management team and the team meetings. The goal is to make integrity and the considerations that go with it a structural subject of discussion within teams and the entire organisation. It is about awareness of what we think is and is not allowed.

Part of this meeting will be a moral deliberation session with all employees. In this session, a case is presented and discussed by following specific steps. We deliberately choose a fictional case in order to protect the identity of whistleblowers/reporters and alleged perpetrators in the case of an actually occurred integrity violation. This moral deliberation session is part of a moral learning process.

7. Publication, evaluation and revision

The integrity officer is responsible for updating this policy and its annexes and for publishing this policy on the Intranet and for making it publicly available on the website of the employer. The integrity officer shall annually, as part of the annual report of Edukans, prepare a report on the policy for dealing with reports of suspicions of abuse or irregularities and the implementation of these regulations. Also, every trimester a report will be given on the occurred integrity issues in the past trimester. These reports shall in any case include:

- a. information about the policy pursued during the previous year with regard to reports of suspicions of abuse or irregularities and the policy to be pursued in this area during the coming year;
- b. information about the number of reports and an indication of the nature of the reports and the results of the investigations;
- c. general information about experiences with preventing unfair treatment of the person reporting;
- d. information about the number of requests for investigations into unfair treatment in connection with the reporting of a suspected abuse and an indication of the results of the investigations and the employer's positions.

The integrity officer shall forward the draft of this report to the Works Council for discussion, after which it shall be discussed in a consultation meeting with the Works Council.

The integrity officer shall provide the Works Council with the opportunity to express its position on the policy for dealing with reports of suspicions of abuse or irregularities, the implementation of these regulations, and the report. The integrity officer shall be responsible for including the position of the Works Council in the report and shall submit this inclusion to the Works Council for approval.

8. Documents that are part of this policy

- Code of Conduct
- Child protection policy
- Corporate Social Responsibility policy
- Whistle Blowing Regulations
- HR manual
- Safety & security policy
- Privacystatement
- Complaints procedure