

# ECF Integrity Policy Framework

## Introduction

ECF helps prevent and cures avoidable blindness and visual impairment in developing countries. In our vision everyone has an equal chance to build a future for themselves with clear vision. We want to contribute to a future in which people have the opportunity to develop themselves to their full potential, are able to take care of themselves and do not have to depend on others. The work of ECF focuses on a vulnerable group of people who should be treated with respect. Respect for others is also important in cooperation with colleagues, cooperation partners and donors.

ECF depends on donations from funders and donors, both private and institutional. We believe it is important that the money that others give to us in confidence is spent properly. We maintain a high standard for integrity in that context.

Integrity does not only concern the careful handling of financial and material resources, but also the safeguarding of respectful manners and the prevention of abuse of power. ECF has established an integrity policy to prevent integrity violations from occurring, and deal with incidents in a good way such as to take care of victims of integrity violations. We follow the guidance for integrity systems of Partos, and the guidance for external accountability of the CBF.

The CBF uses three clusters of integrity violations:

1. Violations of abuse of power:

Corruption, conflicts of interest, leakage of confidential information, and culpable negligence.

2. Financial violations:

Fraud, theft, misuse of goods or services made available, and culpable waste.

3. Interpersonal violations:

Discrimination, intimidation, humiliation, violence, bullying, and sexual harassment.

## The Integrity Policy Framework

The Integrity Policy Framework of ECF contains various policy documents, procedures and agreements, which together contribute to a good integrity system within the organization. Each policy document and procedure focus on a separate aspect of the integrity system.

The following policy documents, procedures and agreements form the Integrity Policy Framework of ECF:

### *Code of Conduct*

The Code of Conduct of ECF forms the basis of the Integrity Policy Framework. It describes how employees of ECF must perform their work with integrity. All employees receive a copy of the Code of Conduct upon the start of employment and indicate that they have taken notice of and agree with its content when signing their contract. The Code of Conduct is discussed periodically (at least once a year) with all employees. Use is made of (fictional) case studies. Employees discuss with each other how you should act in specific situations.

### *Risk analysis*

For ECF it is mapped out which risks can theoretically take place. This also includes risks in the area of integrity. For each risk it is indicated what the chance is that the risk will occur and what the severity of the consequences will be. For each risk, it is also indicated which measures must be taken to control the risk and which measures must be taken to repair possible damage.

### *Complaints and Whistle-blower policy*

If there is nevertheless a (suspected) breach of integrity, the complaints and whistle-blower policy can be followed. This policy describes how (suspicion of) an integrity violation can be reported and how reporters are protected.

### *Communication policy and crisis protocol*

The communication policy and crisis protocol describe when and how ECF communicates about integrity cases and violations to the outside world.

### *Policy on inappropriate behaviour*

This policy indicates how interpersonal violations are prevented and how victims of interpersonal violations are supported in the best possible manner. As part of the policy for inappropriate behaviour, a Confidential Advisor has been appointed.

### *Anti-fraud and anti-corruption policy*

This policy focuses on the prevention and handling of fraudulent and corrupt financial violations. All employees receive a copy of this policy upon the start of employment and sign in their contract that they have taken note of and agree with the policy.

## **Important officers within the integrity system are:**

### *CEO of ECF*

The CEO is ultimately responsible for the integrity system and the various components, such as policy documents and compliance with this system. The CEO is the person who formally orders the handling of the complaint. The CEO also takes the final decision on any appropriate sanction. Finally, the CEO is the person who determines what is reported externally and how.

### *Integrity Officer*

The Integrity Officer plays a role both when it comes to the prevention of integrity violations and in the mitigating part of the integrity policy: handling complaints. An important task is the coordination of the complaint handling. The Integrity Officer is not a separate position, but a task assigned to the CFO. The integrity officer of ECF has been assigned for all ECF offices. A job description of the Integrity Officer is included in Annex 7.

### *Confidential Advisor*

The Confidential Advisor is an externally hired official. Employees can discuss their complaint (both on integrity and inappropriate behaviour) in confidence and ask for advice on how to deal with this.

### *Finance*

The Finance manager can support investigations into financial abuse and is responsible for keeping the anti-fraud and anti-corruption policy up to date.

### *Director Fundraising and Communications*

The director Fundraising and Communications advises on the methods of external accountability, including reporting in the annual report, and is responsible for keeping the communication policy and the crisis protocol up to date.

### *Legal Advisor*

The Legal Advisor is hired externally and advises on the sanctions to be taken.

## **Chain responsibility**

In our programmes, we work together with partner organisations such as (local) NGOs, governments and hospitals. When we have final responsibility in the relevant programs, agreements will be made with the cooperation partners about ensuring ethical behaviour. This is done by including the following items in the cooperation agreements:

- All parties follow the human rights principles of equality, non-discrimination and safety for employees, the target-group and all other persons they have contact with while performing their work.
- All parties have a code of conduct, in which at least the above-named principles have been incorporated.
- All parties that in their projects work with children, have a Child Protection Policy in place based on international human rights standards and national legislation.
- All parties have an adequate administrative organization and internal control system in place, including separation of duties.
- All parties are transparent about their (financial) results and activities.

In addition, we will ask employees of other organisations with whom there is intensive cooperation (for example, employees who are hired for the programs of ECF and the management of cooperation partners) to sign the code of conduct of ECF.

## **Reporting procedure**

The CBF indicates that in some situations it is advisable to report breaches of integrity to the CBF (this is called interim reporting) and to report externally by making the breach known to the public (for example via the website / social media, etc.). This will support accountability to donors and other stakeholders.

Criteria for interim reporting and accountability are:

- Interim reporting / external accountability if you as an organization have had influence via employees / volunteers or the provision of resources (including money) on the integrity violation.
- Interim reporting / external accountability if public opinion considers you responsible for the integrity violation.

In case of doubt, the CBF will be contacted, and it will be decided whether or not ECF must be accountable for the case in question.

The CEB is ultimately responsible when it comes to the decision to report and / or to be accountable through interim reporting. The Integrity Officer advises the CEB on this. The Director Fundraising and Communications advises on the way in which external accountability should be given, the formulation of the message, preparation, and follow-up on spokespersonship.

## **Accountability in the annual report**

Three themes must be explained in the annual report:

1. What are the regulations of ECF on integrity:
  - a. What is arranged with regard to prevention?
  - b. What is arranged regarding reporting?
  - c. What is arranged with regard to enforcement?
  - d. Who has which responsibility in this system?
  - e. What is the communication policy and crisis protocol in this?
  - f. How do we inform stakeholders (employees, trainees, volunteers, temporary workers) about the policy and all schemes?
  - g. Which adjustments / updates to regulations have taken place in the past year?
2. What issues (number and nature) played a role in the year under review and how were they addressed:
  - a. When it comes to tackling the issue (s) itself;

b. In the communication around the issue (s) to stakeholders.

N.B. Due to confidentiality, the locations, and names of those involved may be omitted / made anonymous.

3. What are the reflections on the reported issues and their approach, what are the lessons learnt. How do we keep these lessons "alive"?

### **Ensuring integrity in the organization**

The Integrity Policy Framework and the various procedures together form the integrity system of ECF. This system contributes to “being an honest organization”. An important condition for guaranteeing ethical behaviour is making the policy and the vision of integrity known to all employees. To this end, the Integrity Policy Framework is discussed with all employees in every member office every year. Case studies are discussed, so that the employees, through so-called moral deliberation, jointly exchange what is desired behaviour and what is not ethical and is not tolerated. This achieves familiarity with the integrity system and consensus on the desired behaviour within the organisation. The Integrity Officer organizes these meetings. Finally, every employee, including hired staff, trainees, and volunteers, is obliged to sign the Code of Conduct upon start of employment.

## **Annex I: The integrity officer**

The integrity officer plays a role when it comes to the prevention of violations of integrity, as well as in the curative part of the integrity policy: in the handling of complaints.

### **Prevention**

When it comes to preventive tasks, the integrity officer has the responsibility to bring the integrity policy under the attention of the staff. This can be done by discussing the code of conduct with the staff on a yearly basis. Next to this, the integrity policy and the code of conduct should also be brought under the attention of cooperation partners and target group participants. The integrity officer can play a role in this.

The integrity policy must be kept up to date. If there are incidents in the field of integrity, the organization will have to discuss which lessons can be learned, to prevent ne incidents in the future. Based on the evaluation of incidents, the integrity policy can be further developed, or adjusted. This is called moral deliberation. The integrity officer coordinates this and ensures that the employees concerned have sufficient skills to conduct moral deliberation.

It is always better to prevent risks than to restore situations afterwards. That is why it is important that the organization identifies vulnerable processes and positions or, so to say, conduct a risk analysis. The risk analysis is included in the annual plans ECF. This is done (but not exclusively) based on interviews, audits, and evaluations of incidents. It is a process that must be repeated on a regular basis. The CEO, or local director is the client, the management carries out this for its own teams, supported by the integrity officer.

### **Curative**

The integrity officer plays an important role in the handling of complaints or reports of (suspected) integrity violations. The integrity officer is the person to whom the complaint is reported, or to whom the complaint is passed on by the management, and who subsequently coordinates the handling of the complaint. In some cases, the integrity officer can independently investigate the complaint. In case of complex issues or too close involvement, the integrity officer will have the complaint investigated by a complaints committee.

Not only employees, but also customers, program participants and employees of fellow organizations can report a breach of integrity. It is important that the identity of the reporter must be protected. This can be done by passing on the report via a confidential adviser. The integrity officer also has the responsibility to keep the complainant's identity confidential, if asked for by the complainant, when handling the complaint.

## **Tasks of the integrity officer**

According to the Partos and GDN guidelines, the Integrity Officer has the following tasks / roles:

- Being the point of contact for the reporting of complaints regarding suspected irregularities or integrity violations. The integrity officer will treat the complaints confidentially, the identity of the complainant will only be made known after explicit permission from the complainant.
- Reporting the complaint (anonymously) to the person ultimately responsible in the organization and advising on the steps to be taken.
- Investigate the complaint or coordinate the investigation by the complaint committee.
- Make a shortlist with referred suppliers of complaint investigators, to be well prepared in case you need to investigate a complaint.
- Arrange (that it is clear how to contact) legal consultants in case legal advice is needed.
- Ensure that the contact details of the integrity officer are published, in such a way that employees, cooperation partners and target group participants know how to contact you. Make sure that the role of the integrity officer is clear to all.
- Communicate the code of conduct and integrity policy and make sure all employees are well informed about it.
- Conduct a risk analysis in cooperation with the management.
- Draft a multi-year plan for keeping the risk analysis up to date, together with the management.
- Draft a policy how to prevent violations (drafted per type of violation).
- If necessary, contract suppliers to support the implementation of the preventive policy (for example: training agencies for moral deliberation).
- Develop a plan to train employees in moral deliberation.
- Collecting reports of moral deliberations and based on these reports, update the existing policies.