



VVOB'S Integrity Policy

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Introduction

Integrity is one of VVOB's five core values. Integrity is a priority in our cooperation with each other, partners, and donors. We do what is right, even when it is difficult.

VVOB commits to an organisation-wide culture of integrity in which we all have a responsibility and a voice, and where we can count on the support and help of VVOB when dealing with integrity issues and ethical dilemmas:



Responsibility

All of us play a critical role in ensuring that VVOB is a great work environment and in protecting our culture, our quality of work, and our reputation.



A voice

When you believe something is not right, you can speak up and share your concerns, knowing that VVOB wants to hear those concerns and will not tolerate any reprisals against you.



Help

If you are unsure of what to do in a situation, you have support and guidance available in terms of people, policies, processes and trainings.

Sound leadership fosters this ethical environment and culture of our organisation, allowing the long-term public interest to prevail over short-term individual interests. We are consistent and reliable, both as an organisation and as individuals, and we accept responsibility for our actions.

This document describes the principles of our integrity policy, including our codes of conduct and internal structure, support and proceedings to deal with integrity dilemmas and violations of our codes of conduct, in order to foster an organisation-wide culture of integrity.

This integrity policy applies to all VVOB staff, board members, interns and volunteers.

Integrity Charter Belgian Development Cooperation Sector

In 2018, the Belgian minister of Development Cooperation invited the Belgian development actors to reconfirm their commitment to integrity by signing a charter. VVOB signed this 'Integrity Charter' on May 28, 2018. The charter contains important basic principles on how the complying organisations should work on maintaining their integrity. This includes having an ethical code, organising courses on integrity, introducing a contact line for integrity violations and communicating on these violations externally once per year. The integrity charter emphasises the importance of both financial as well as moral integrity.

VVOB commits to the Integrity Charter and to an organisation-wide culture of integrity, and provides the necessary support, help, training, tools and procedures to achieve this.

VVOB's Codes of Conduct

Purpose

VVOB is committed to maintaining the highest degree of ethical conduct amongst all individuals who are involved in implementing VVOB projects and programmes. Therefore, we have developed Codes of Conduct to detail VVOB's expectations of behaviour in key areas. We differentiate between two Codes of cConduct:

1. VVOB's General Code of Conduct

2. Code of conduct VVOB's Child and Youth protection policy

The purpose of these Codes of Conduct is to set out the conduct expected of individuals whilst under contract with VVOB, and is an integral part of all employment contracts and service contracts. The Codes are applicable at all times, and breaches of the Codes of Conduct are grounds for disciplinary sanctions, up to and including dismissal.

Whilst recognising that local laws and cultures differ considerably from one country to another, VVOB is an international organisation. Therefore, VVOB's Codes of Conduct are developed based on international and UN standards.

Individuals working with VVOB are expected to uphold local laws wherever they operate, except where the Codes of Conduct are more stringent, in which case the Codes apply.

VVOB's Codes of Conduct are not intended to be exhaustive. Rather, they serve to remind individuals working with VVOB of the basic principles of ethical behaviour and relevant standards of conduct that should guide their thoughts, decisions and actions in responding to the wide range of situations and challenges they might be confronted with during their employment or services with VVOB.

VVOB takes appropriate action to ensure that the content and understanding of the principles of the Codes of Conduct and the procedures for grievance handling and whistle-blowing are communicated to all individuals who are involved in implementing VVOB projects and programmes.

Scope

These Codes of Conduct apply to VVOB personnel, board members, volunteers, interns and to all other individuals who are involved in carrying out VVOB's projects and programmes. These include but are not limited to: contractors, sub-contractors, (including their employees, volunteers, directors and officers and any other personnel), as well as any consultants or affiliates that may work with such contractors or subcontractors, as applicable.

VVOB's General Code of Conduct

Integrity

We expect all individuals who are involved in implementing VVOB projects and programmes to behave in accordance with ethical principles, and act in good faith, honesty and fairness. Therefore, we must:

- Respect national and local laws;
- Never engage in any level of physical or verbal violence or threat of violence;
- Not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so;
- Ensure that their conduct does not bring VVOB into disrepute and does not impact on or undermine the individual's ability to undertake the role for which he or she is employed;
- Report suspected wrongdoing or breaches of VVOB's ethical principles, rules, regulations or policies.

Respect for People, Policies and Planet

We expect all individuals who are involved in implementing VVOB projects and programmes to demonstrate respect for the dignity, value, equality, diversity and privacy of all persons, and demonstrate respect for policies and planet. We strongly believe that diversity is a major asset for our organisation. Therefore, we must:

- Respect and value differences and treat all people fairly and with dignity and courtesy;
- Consider the sensitivities of people's customs, habits and religious beliefs and avoid any behaviour that is not appropriate in a particular cultural context.
- Never engage in any form of discriminatory or offending behaviour based on a person's race, skin colour, ancestry, national or ethnic origin, nationality, gender, sexual orientation, marital status, age, wealth, religious, non-religious, political or philosophical beliefs, organisational membership, current or future health status or disability;
- Abstain from and actively discourage all forms of harassment, including verbal, nonverbal, written or physical abuse;
- Never engage in abusive or exploitative conduct;
- Never carry weapons during working hours;
- Never engage in any commercially exploitative activities with children or vulnerable adults including child labour or trafficking;
- Never engage in sexually exploitative conduct. This is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
- Never engage in sexually abusive conduct. This is actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
- Never engage in sexual activity with children (persons under the age of 18). Mistaken belief in the age of a child is not a defence;
- Never exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, with vulnerable persons or beneficiaries of our programme interventions;
- Encourage and maintain a work environment characterised by good working relations;
- Adhere to all legal and organisational health and safety requirements in force and behave in a manner such as to avoid any unnecessary risk to the safety,

health and welfare of yourself and others;

- Respect local, national and international partners and policies.
- Strive to minimise the climate & environmental impact of our operations and include climate & environment as important themes in our interventions.

Quality and Commitment

We expect all individuals who are involved in implementing VVOB projects and programmes to ensure that professional and personal conduct is consistent with VVOB's values and standards, and that all individuals who are involved in implementing VVOB projects and programmes demonstrate a high level of professionalism and loyalty to VVOB, its vision, mission and strategic and operational objectives. Therefore, we must:

- Deliver on the duties of our position in an ethical and professional manner and take responsibility for carrying out the duties of our position to the best of our abilities;
- Never work under the influence of alcohol or drugs, or be in possession of, illegal substances on VVOB premises, accommodation or during working hours;
- Keep in mind the longer-term objectives of VVOB and the strategic and operational partners when managing short- and medium-term activities and operations;
- Update our knowledge and skills and develop our professional competencies to maintain excellent standards and use this professional expertise constructively for the benefit of VVOB, its programmes and strategic and operational partners;
- Ensure to have correct (reliable, complete, detailed and substantiated) information for decision-making purposes.

Accountability and Transparency

We expect all individuals who are involved in implementing VVOB projects and programmes to take responsibility for one's actions, decisions and their consequences. Therefore, we must:

- Ensure that all VVOB assets and human, financial and material resources entrusted to us are used in a responsible and optimal manner for the benefit of VVOB and the programme and project objectives;
- Record all transactions and prepare accurate and complete records, in accordance with established procedures;
- Not conduct or authorise facilitation payments or bribery;
- Ensure that VVOB IT equipment, software or e-mail and social media platforms are not being used to engage in activity that is illegal under local or international law or that encourages conduct that would constitute a criminal offence. This includes any material that intimidates or harasses any group based on protected characteristics, or encourages extremism;
- Never use VVOB IT equipment to view, download, create, distribute or save in any format inappropriate or abusive material including but not limited to pornography or depictions of child abuse;
- Declare any financial, personal or family (or close intimate relationship) interest in matters of official business which may impact on the work of VVOB;
- Avoid that romantic relationships with colleagues result in conflicts of interest related to or have an impact on the work atmosphere. Therefore VVOB expects its staff to report such relationships to their superior so that a possible risk of conflicts of interests can be ruled out and transparency can be preserved;
- Be aware that romantic or sexual relationships between employees where one individual has influence or control over the other's conditions of employment are inappropriate. If such a relationship would arise nonetheless, it needs to be reported immediately to the superior or the focal point of integrity in order to find a fair and reasonable solution;
- Not be involved in awarding benefits, contracts for goods or services, employment or promotion within VVOB, to any person with whom the employee has a financial, personal, family (or close intimate relationship) interest;
- Not accept significant gifts or any remuneration from governments, communities with whom we work, donors, suppliers and other persons which have been offered to the employee as a result of our work with VVOB, except in cases when it is culturally inappropriate to decline. In case of the latter, the acceptance of a gift should always be reported to the management team. In no case may gifts influence or give the impression of influencing decision-making of the individuals who are involved in implementing VVOB projects and programmes in performing her or his job.

I don't work in finance or accounting. Is "financial integrity" my responsibility?

Yes. Accuracy in record-keeping is not the job of one team or one department. It is a responsibility we all share. From preparing and monitoring budgets, financial record keeping to understanding and using expense reports... all our everyday transactions must be accurate, complete and properly recorded.

VVOB's Child and Youth Protection Policy

VVOB ensures that their employees avoid any behaviour or conduct that compromises the safety and protection of Children and Youth within its activities, operations and programmes.

VVOB Personnel Must:

Prevent

- Be aware of potential risks, amongst others during project planning and implementation, and take appropriate action to minimise risks
- Create an environment where concerns can easily and safely be raised and discussed;
- Recognise and remedy situations which may potentially lead to violent acts against Children or Youth;

Create a child and youth friendly environment

- Contribute to an environment where Children and Youth are respected and encouraged to discuss their concerns and rights;
- Ensure that Children and Youth are aware of their rights, policies and resources available if there is a problem;
- Work with Children and Youth to define what is acceptable or unacceptable behaviour ;

Report and respond:

- Report any Child and Youth abuse and protection concerns to relevant partners and take appropriate actions;
- Ensure the Child or Youth and, if appropriate, his/her parents or guardians are well-informed and participate in the decision-making and the types of intervention agreed upon.

VVOB Personnel Must Never:

- Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years regardless of the age of majority/consent or custom locally. Mistaken belief of a Child's or Youth's age is not a defence;

- Abuse or exploit a Child or Youth, or behave in any way that places a Child or Youth at risk of harm;
- Exchange money, gifts, employment, goods or services for sex with a Child or Youth, including sexual favours or other forms of humiliating, degrading or exploitative behaviour or any other behaviour that could be deemed exploitative of a Child or Youth;
- Have a Child or Youth they are working with stay overnight at their home unsupervised or sleep in the same room or bed with a Child or Youth;
- Do things of a personal nature for Children or Youth that they can do themselves;
- Offend, insult, humiliate or degrade Children or Youth, or engage in any form of emotional abuse;
- Discriminate or provide favourable treatment to one Child or Youth;
- Kiss, or persuade a Child or Youth to kiss VVOB personnel;
- Engage in extended hugging, tickling or persuading of a Child or Youth to hug VVOB personnel;
- Touch a Child or Youth in any area that would be covered by a bathing suit;
- Carry a Child or Youth or have them sit on the lap of VVOB personnel;
- Be alone with a Child or Youth;
- Engage in prolonged physical contact with a Child or Youth;
- Restrain a Child or Youth;
- Where an activity involves caring of a child in the absence of the child's guardian: neglect, or fail to provide for the child's basic needs;
- Discipline a Child or Youth using any form of physical contact, or emotional or psychological pressure, abuse or intimidation;
- Expose a Child or Youth to inappropriate images, films and websites including pornography and extreme violence.

The above is neither an exhaustive nor exclusive list and VVOB will consider all related actions and behaviour which may compromise the rights and protection of Children and Youth.

Roles and Structure for Organisation-Wide Culture of Integrity

Within VVOB we have identified the following roles and structure to nurture and maintain an organisation-wide culture of integrity:

Integrity Advisor

Within VVOB headquarters the Global Lead of HR acts as the organisation-wide Integrity Advisor. The role of the Integrity Advisor is above all a preventive role.

The Integrity Advisor takes the lead in the development, implementation and evaluation of VVOB's integrity policy, integrity action plan and integrity-related tools, trainings and learning loops. The Integrity Advisor also advises colleagues and managers on the effective interpretation and implementation of the VVOB integrity policy and provides a forum for the exchange of views, experiences and best-practice approaches between different country offices. The Integrity Advisor can also act as a sounding board for VVOB staff members for integrity related concerns or issues. The Integrity Advisor also is responsible for the internal and external communication on integrity violations.

The Integrity Advisor can be contacted via the email: jasmien.claes@vvob.org

Complaints Manager

The role of Complaints Manager has been assigned to a representative of Fiabel, the Belgian federation of institutional actors, to ensure VVOB staff members and partners, are able to report suspected integrity violations via an independent, neutral and confidential reporting channel.

The Complaints Manager is above all a reactive role. They act as an internal point of contact to receive and follow-up on complaints of (suspected) integrity violations, and are responsible for the investigation of the complaint (if considered admissible), writing of the report including recommendations which could include some sanctions. The responsibility to decide on sanctions and their implementation lies with the GD

The Complaints Manager can be contacted at integrity@vvob.org

Integrity Committee

The VVOB Integrity Committee is an internal committee that consists of the VVOB directors, the Integrity Advisor, Complaints Manager as well as the Confidential Counsellor. Their mandate is to guide VVOB in the area of integrity.

The committee will discuss complex ethical dilemmas and situations from our work practice and will provide internal advice, procedures and measures on issues of ethics and integrity within VVOB.

During these general thematic meetings (every six months), the Integrity Committee will discuss general integrity issues in finance, HR, communication, donor diversification and programme operations. For these meetings other VVOB colleagues can be invited to join, depending on the agenda of the meeting.

Restricted Integrity Committee

In some instances, the Complaints Manager may be faced with a very urgent, complex ethical dilemma that they are in the process of investigating. If that is the case, and depending on the Complaints Manager's request for support, they may use some members of the Integrity Committee as a sounding board. The Integrity Advisor is best placed to act as sounding board for the Complaints Manager, but other members of the Integrity Committee may fulfil this role if required. It is important to note, that the General Director may not be used as a sounding board due to having a conflict of interest as decision-maker regarding the outcome of the integrity case complaint.

Confidential Counsellors

VVOB wants to ensure that we offer a safe and pleasant working environment for all staff, interns, volunteers and partners. Any form of undesirable conduct such as sexual harassment, violence, intimidation, aggression, bullying or other breaches of our codes of conduct will not be tolerated.

Within each VVOB country office at least one Confidential Counsellor has been appointed who will serve as a contact person for anyone who has been confronted with or suspects, directly or indirectly, breaches of VVOB's codes of conduct, or has questions pertaining to integrity.

You can contact the Confidential Counsellors for information, advice and support, and discuss confidential matters with them. The Confidential Counsellor must always maintain strict confidentiality in respect of all information relating to a complaint or an intended complaint about inappropriate behaviour that comes to his/her knowledge. This duty of confidentiality does not apply with regards to any of his/her fellow Confidential Counsellors, a Confidential Physician (if appropriate), or any authorised officer(s) of the police or the judicial authorities. Information shared with the Confidential Counsellors remains in all cases confidential, except when explicit permission is given by the person filing the complaint to mediate to either reach a solution or speed up a complaint process. Talking to Confidential Counsellors may serve various purposes:

- First, it provides the opportunity to be heard or ask questions and share concerns in a safe environment with someone who knows the organisation and VVOB's integrity policy and procedures;
- By talking about a case and exchanging information and ideas, more clarity can be given about the specific case you may be struggling with: is it a potential violation of VVOB's codes of conduct, is it an ethical dilemma, a work-related conflict, or maybe something else?
- It provides support in the process of deciding whether it is desirable and/or necessary to take further steps and if so, to clarify what these steps can be. The Confidential Counsellor will take up a coaching or mentoring role in this decision-making process;

- When you decide to take further steps, the Confidential Counsellor will refer you. Depending on the situation and case, reference may be made to:
 - The formal reporting channel of breaches of VVOB's codes of conduct (the Complaints Manager);
 - The Integrity Advisor in case the colleague is struggling with an ethical dilemma (Global Lead HR);
 - The Country Programmes Manager, the Operations Manager, Global Lead HR, in case of a workplace conflict;
 - The Country Programmes Manager, the Operations Manager, Global Leader HR in case of questions about integrity within HR areas such as training, well-being, evaluation and functioning, employment status and careers;
 - To the Country Programmes Manager, Operations Manager or Global Director of Finance in case of questions about financial integrity.

Health and Safety Advisor for Psychosocial Aspects: IDEWE

In case you are experiencing psychological and/or physical complaints as a result of your working conditions, or if you would like to have the risks analysed, either formally or informally, you can contact the Belgium-based external health and safety advisor for psychosocial aspects: IDEWE. IDEWE can advise on preventive measures and can offer informal and formal psychosocial interventions for work-related psychosocial aspects. Although their website is only available in Dutch and French, advice is given in English as well. Below their contact information:

IDEWE Brussels
Tel: 0032 (0)2 237 33 24
Email: Brussel@idewe.be

Ethical Commission Donor Check

VVOB aims to improve education systems in a sustainable way. This is reflected in the way we implement projects, but also in our choice of financial partners. Before accepting funding from a donor, we apply an ethical check to make sure the funds are generated in a way that is in line with a set of minimum ethical standards determined by our Board of Directors.

More specifically, each potential financial partner/donor is screened on activity level using the exclusion list of the European Development Finance Institutions (EDFI) and the VVOB values of "Respect" and "Integrity" as described in this policy as guidance. We next use vetting software to screen if donor organisations and key staff are sanctioned under international sanction laws. Additional checks are done for donors situated in countries where there exist high risks around anti-money laundering and so-called "authoritarian" countries.

A VVOB Ethical Commission, which reports to the Board of Directors and consists of the General Director, the Global Director of Programmes and assigned members of the Board of Directors, operates as a gatekeeper and decides on whether VVOB can move forward (or not) with donors in situations where there remain doubts following the ethical check.

May I accept a meal or a gift from a partner VVOB is working with?

In most circumstances, modest and infrequent meals or gifts may be accepted. However, whenever a partner pays for a meal or offers you a gift, always consider the specific circumstances and whether your impartiality could be compromised or appear to others to be compromised. Talk with your manager if you are unsure about whether to accept or not.

There is a conflict between what's in our Code and the laws in the country where I work. I am not sure what to do.

The best approach is to follow the stricter requirement. If that is unclear, seek guidance from your managers, the Confidential Counsellors or the Integrity Advisor.

Ethical Dilemmas

As unpleasant as it might be, it is likely that within the work of VVOB you may be confronted with ethical dilemmas. An ethical dilemma is a conflict between alternative options for action where, no matter what you do, an ethical principle or value will be compromised. In such a situation, the following steps might guide you in deciding how to act or react in such a situation:

Identify the ethical dilemma/problem;

1. **List possible solutions (what can I do?) and any obstacles to resolving the problem;**
2. **If appropriate, seek input of others;**
3. **Determine the best approach (what should you do?):**
 - **Is it consistent with VVOB's codes of conduct or any applicable law or regulation?**
 - Would the approach subject you or VVOB to embarrassment?
 - How would your approach be perceived by others, if published in the newspaper?
 - Would you be comfortable with the example it sets for future decisions?
4. **If the path is not clear: ask for guidance and voice your concerns!**

Addressing and Reporting a Violation of VVOB's Codes of Conduct

Obligation of All of Us

It is the responsibility of all of us to report any violations or suspected violations of our codes of conduct or events that could lead to any such violations. Any person's failure to report any such acts or transactions following their discovery shall be grounds for disciplinary action.

If you feel VVOB's codes of conduct are violated, if our standards have not been met, if you need access to relevant policies related to integrity issues, or if you have any questions regarding integrity and ethics within VVOB, please ask for guidance or voice your concerns by contacting your supervisor, manager or the Confidential Counsellor in your country, or the Integrity Advisor at head office.

So, remember:

Act if you see an integrity issue.

Ask if you're not sure.

I suspect—but am not certain—that someone is violating our Code. Should I keep my concerns to myself?

No. If you suspect a violation, say something. It is better to raise a potential problem than to wait and risk harm to others or to the organisation. If you want, you can first contact a Confidential Counsellor to talk about your concerns. Reporting "in good faith" means you are coming forward honestly with information that you believe to be true, even if, after investigation, it turns out that you were mistaken.

Reporting channels

VVOB encourages an open-door policy and suggests that you share your questions, concerns, suggestions or complaints related to integrity issues with someone who can address them properly. In most cases, VVOB's managers are in a good position to address an area of concern.

When a colleague is not satisfied or comfortable with following the open-door approach, he or she can contact the Confidential Counsellor of the country office or Integrity Advisor to seek further advice. They can contact the Complaints Manager directly to report a violation of VVOB's codes of conduct at integrity@vvob.org.

One of my colleagues emailed an inappropriate joke to me and some other colleagues. I find it offensive, but I do not know if I should approach my colleague with my concern. What should I do?"

We each have an obligation to ensure that VVOB is a great place to work, and offensive behaviour such as this is not acceptable. You can approach your colleague and say that you are offended by the email. If you feel uncomfortable speaking directly to your colleague, contact your manager, Confidential Counsellor or Integrity Advisor.

Culturally, it is not common to report a concern about someone that is in a leadership position. What should I do?

It is important to say something about your concerns. VVOB respects its diverse workforce, considers various cultural norms when looking into concerns and takes all appropriate actions to protect the identity of the person who is sharing the information, as well as the information that is being shared.

How to Report a (Suspected) Violation

VVOB colleagues and other parties (for example: partners, subcontractors, consultants and participants of activities) may submit complaints concerning suspected violations of our Codes of Conduct to:

- Your supervisor
- The Complaints Manager at integrity@vvo.org

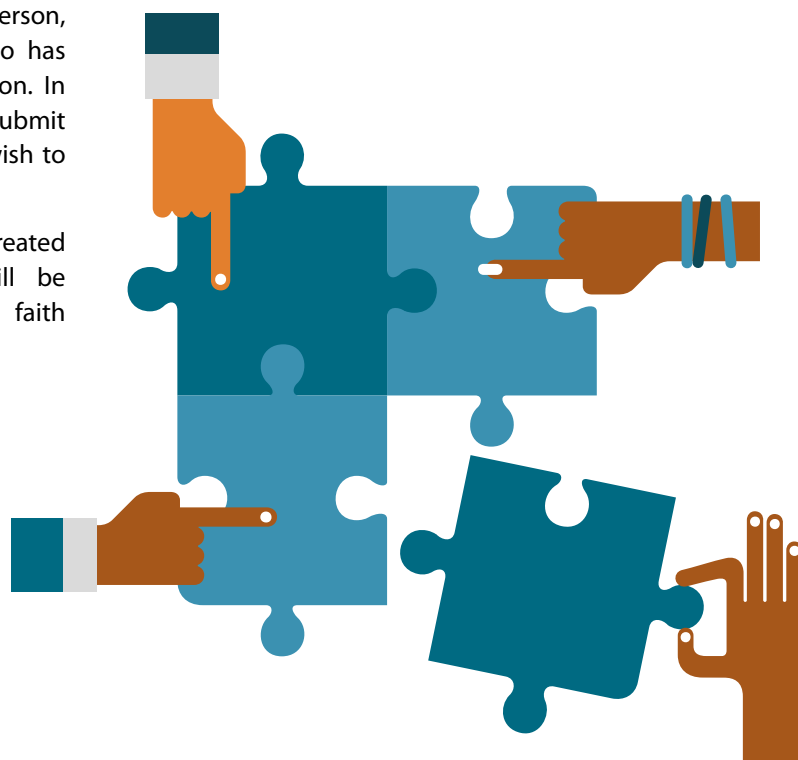
Every complaint should identify the code provision(s) that were allegedly violated and describe in as much detail as possible the factual basis for the complaint.

To enable a fair and timely resolution, a complaint must typically be submitted within 180 days after the alleged violation occurred. Complaints submitted more than 180 days after the alleged violation occurred will be considered at the sole discretion of VVOB's Complaints Manager.

VVOB ensures that people can raise good faith concerns about actual or suspected violations without fear of reprisal or being threatened by doing so. Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

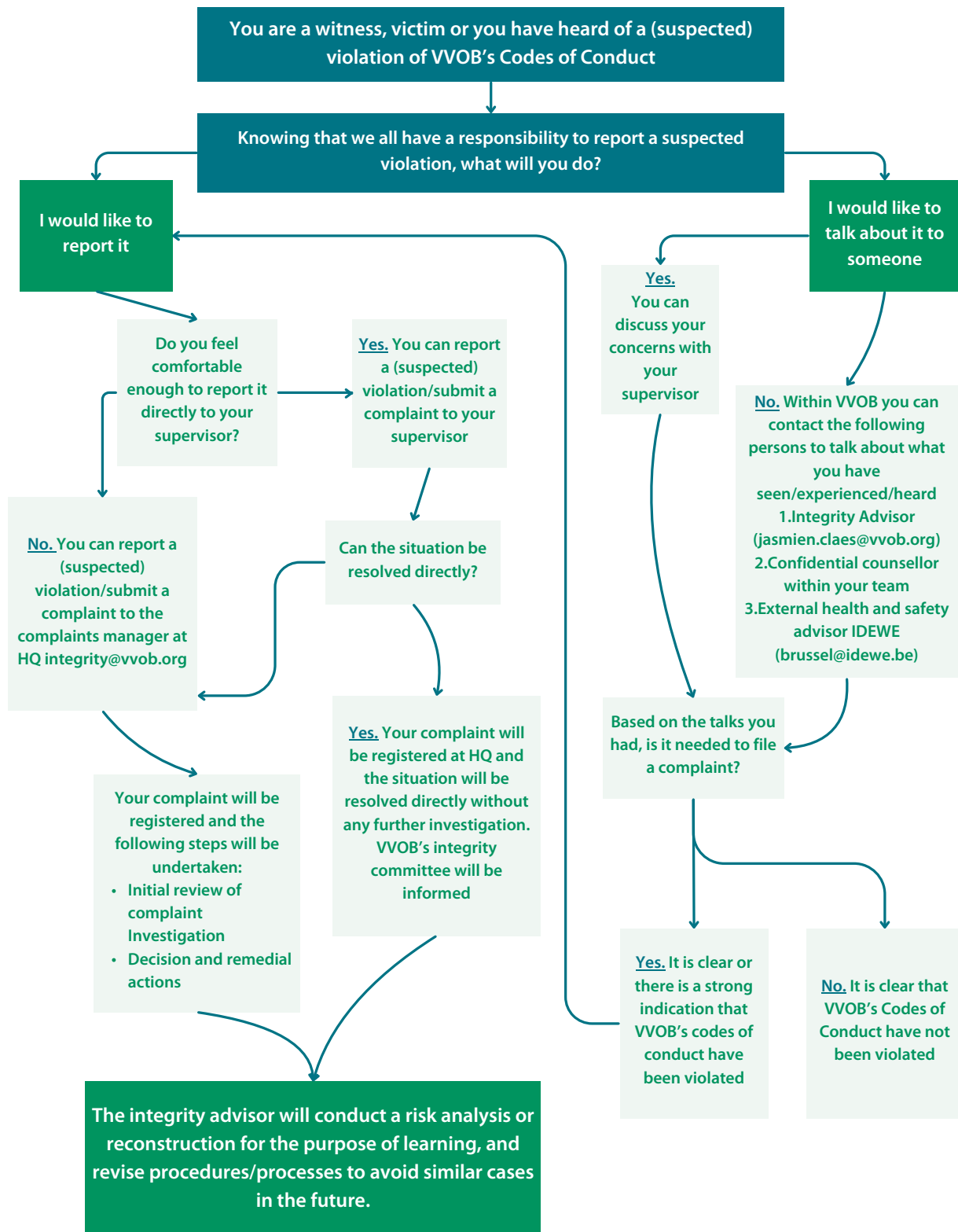
From the moment an integrity complaint has been submitted, VVOB will offer psychological support to the victim of the integrity violation. In the event that someone is reporting on behalf of another person, then the support is offered to the person who has been subjected to a suspected integrity violation. In addition, VVOB may support the individual to submit the complaint to local authorities should they wish to do so.

All concerns raised by the employee will be treated promptly, fairly and discretely. No one will be disadvantaged or victimised for raising good faith concerns.



Integrity at VVOB: CALL TO ACTION

ACT if you see an integrity issue, **ASK** if you are not sure



Handling of a Reported (Suspected) Violation

All reported complaints will be centrally managed by the Complaints Manager. This means that all supervisors are required to notify the Complaints Manager of all suspected violations which are reported to them.¹

Complaints and questions are treated with the utmost confidentiality. However, they may not be notified anonymously. We must be able to contact the complainant in order to obtain possible additional information.

Initial Review

The Complaints Manager will review the complaint and determine its admissibility based on a preliminary analysis. A complaint usually will not be pursued if it lacks sufficient factual allegations to conduct a preliminary inquiry, or if the Complaints Manager has good reason to believe it was made in bad faith. If there are sufficient grounds for further follow-up, an inquiry will be conducted.

Once the Complaints Manager has conducted a preliminary analysis, they will meet with the Integrity Advisor and present the findings. Together they decide on the admissibility of the case, and whether an investigation should be launched. The Complaints Manager will inform the complainant that an investigation is being launched. If it has been decided that an investigation will not take place, then the Complaints Manager will notify the complainant about the decision in writing. The Integrity Advisor is present at this stage in the event that there may be HR consequences or broader issues related to the integrity policy.

Investigation

An investigation will be conducted for the purpose of determining whether VVOB must undertake remedial actions. The Complaints Manager formulates a proposal for this investigation including the steps to be taken, timing, budget and persons involved. This proposal will be shared with VVOB's Integrity Advisor. During the investigation phase the Complaints Manager may request further information from the Integrity Advisor/ Global Lead HR for pertinent information pertaining to the investigation. In addition, the Integrity Advisor may act as a sounding board for the Complaints Manager throughout the investigation process.

The investigation may include the following steps:

- Interviewing and hearing the complainant (if any), the subject, and, at the Complaints Manager sole discretion, relevant witnesses identified by either party.
- Reviewing any documents provided by the complainant, the subject and/or other witnesses.
- Triage of severity, taking into consideration the magnitude of harm, crime status (to capture whether the alleged conduct may constitute a crime in the respective national or international legislation), who is the survivor (e.g. extra vulnerable person or persons, or not), who is the perpetrator (one or more persons, management staff or not, etc), reputational impact...
- In case it is necessary, and in consultation with Integrity Advisor, consulting with subject matter experts;
- In case it is necessary, and in consultation with VVOB's Integrity Advisor taking any other steps appropriate to aid in determining whether the complaint should be pursued further.

In extremely complex cases the Complaints Manager may seek advice from a restricted Integrity Committee, without the presence of the General Director.

Decision and Remedial Sanctions

After considering all information gathered during the inquiry, the Complaints Manager and Integrity Advisor will provide a written report to VVOB's General Director and all supporting materials, including minutes of any interviews conducted; all documents collected; and minutes or copies of any oral or written reports by any subject matter expert(s). This report includes recommendations and any sanctions that are advised. The elaboration of the sanctions always takes place in consultation with the Integrity Advisor, and are in line with HR policy. The implementation of the sanctions is done by the VVOB HR team based on the input of the Complaints Manager and Integrity Advisor.

The General Director has the role to validate the recommendations and sanctions provided in the report. In the event that the General Director does not agree with the recommendations, then the issue will be escalated to the Board of Directors. The issue can be directly escalated to the Board of Directors if the General Director has a conflict of interest regarding a suspected violation.

¹ We are aware that some integrity violations may already be resolved or be in the process of being resolved once they have been reported at either country level or head office level. All integrity violations must be reported to the Complaints Manager regardless of whether they have been resolved or are in the process of being resolved.

Without limitation, possible remedial sanctions may include:

- Issuing a warning letter;
- Counselling;
- Suspension from VVOB for a specified time;
- Dismissal without notice or payment in lieu of notice.

In case of (suspected) criminal acts, a police report will be filed, and the subject will be immediately suspended.

The Complaints Manager and/or Integrity Advisor will notify the complainant, subject and programme manager in writing of the decision. The implementation of any sanctions will be done by VVOB HR department.

VVOB provides victim counselling and support on an as-needed basis and considering and adapted to the specific circumstances of the situation. This support is available from the moment when a complaint is submitted by a victim, and will be proactively communicated by VVOB to the victim.



The investigation is subject to the following general principles:

- Transparency;
- Objectivity;
- The suspect is presumed to be innocent until allegations are proved to be true;
- The suspect is informed of the allegations (however protecting the anonymity of the victim) and given an opportunity to explain his or her version of events.

If VVOB's Complaints Manager, Integrity Advisor and General Director determine that the complaint does not violate our codes of conduct, no further steps will be taken and the subject, the complainant and the programme manager will be notified of the decision.

VVOB will endeavour to complete the preliminary inquiry within 2 months after the initial review of the complaint.

Irrespective of the outcome of the investigation, the Integrity Advisor will conduct a risk analysis or a reconstruction of what happened in order to learn from this and, if necessary, revise processes and procedures in order to avoid similar cases in the future

In summary, the steps taken when a (suspected) violation of VVOB's Codes of Conduct is reported via the Country Programmes Manager, the Global Director of Programmes, the Global Director of Finance, the General Director or focal point integrity, are:

R= Responsible, A=Accountable, C=Consulted, I=Informed

A (suspected) violation of VVOB's Codes of Conduct is reported	
1. Initial review	
	R: Complaints Manager A: Complaints Manager C: Complainant I: Integrity Advisor, Complainant, Country Management Team
2. Investigation	
	R: Complaints Manager A: Complaints Manager C: Integrity Advisor, Complainant, suspect, relevant witnesses, experts I: Country Management team, restricted Integrity Committee, complainant, suspect
3. Decision and remedial actions	
	R: Complaints Manager A: General Director C: Experts, Integrity Advisor I: Country Management Team, Integrity Committee, complainant, suspect
4. Learning and improving	
	R: Integrity Advisor A: Integrity Advisor C: Integrity Committee, Country Management Team, relevant departments I: All VVOB staff

Internal Communication, Dialogue and Training

Awareness rising on integrity within VVOB is important to us, since it contributes to the debate about what ethical behaviour means to us in practice, what we can expect from each other and what we can do to prevent and combat unethical behaviour within our organisation.

As described above, we encourage an open-door policy and open communication on integrity issues and ethical dilemmas. VVOB takes appropriate action to ensure that the content and understanding of the principles of the Codes of Conduct and the procedures for complaint handling and whistle-blowing are communicated to all individuals who are involved in implementing VVOB projects and programmes.

We do this through:

- Putting integrity on the agenda of our induction programmes, going through VVOB's Codes of Conduct and complaints procedure with new colleagues;
 - Organising general information sessions on our integrity policy, with special attention to our Codes of Conduct and complaint/reporting procedure;
 - Developing internal communication materials (pocket guide, brochure) of our integrity policy, Codes of Conduct and complaint/reporting procedure;
 - Organising team workshops on VVOB's Codes of Conduct and trainings on ethical dilemmas and ethical decision-making;
 - Developing job profiles for Confidential Counsellors, appointing them, setting up a peer learning group and providing training to the confidential counsellors;
 - Organising trainings on financial integrity (e.g.; corruption prevention trainings, sharing knowledge and good practices on financial integrity within VVOB);
 - Communicating internally and externally (annual report) on integrity issues we are confronted with, including lessons learned and remedial actions taken;
- Annually the Integrity Advisor will draft an integrity progress report to update on our efforts and challenges related to integrity with VVOB which will be shared with all colleagues worldwide;
 - Annually, the General Director will report to the Board of Directors about the number and nature of integrity complaints and cases reported and handled;
 - We report about the number of integrity complaints and cases reported and handled in our annual report.





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