

# INTEGRITY POLICY LILIANE FONDS AND MIVA



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# Integrity Policy Liliane Fonds and MIVA

## Introduction

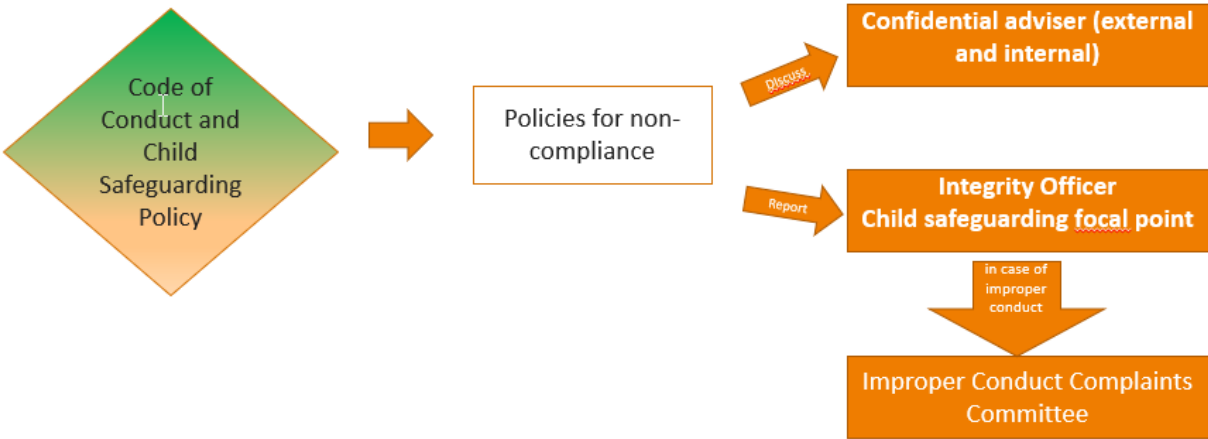
Trust and connection underpin the way we work, requiring transparency. The Integrity Policy of the Liliane Fonds and MIVA (hereinafter: the Liliane Fonds and MIVA) provides a coherent framework describing the behaviour desired by the Liliane Fonds and MIVA from their employees, ambassadors and others working for or on behalf of the Liliane Fonds and/or MIVA. By employees, we mean both employed and volunteer staff. 'Others' working for or on behalf of the Liliane Fonds and/or MIVA include self-employed workers and consultants.

In this Integrity Policy, we describe how we promote desired behaviour, through which arrangements we enforce this desired behaviour and where you can submit reports or complains. This document also contains an overview of all regulations and these are also attached to the Integrity Policy as appendices. Several regulations apply to (S)POs, this is indicated in the regulations.

By improper conduct we mean:

- improper conduct: such as bullying, (sexual) harassment, aggression, violence, discrimination and
- misconduct: e.g. theft, fraud, abuse of power, corruption.

The Integrity Policy contains the following sections:



See the appendix for the definitions used in this policy.

## Prevention

We steer for desired behaviour and integrity as soon as we consider a new partnership. In order to obtain sufficient assurance about the conduct and integrity of a new employee, consultant, self-employed person or other hired staff member at the start of collaboration with this potential employee, we take the following measures:

- For every employee who enters paid employment (including temporary employees such as self-employed persons), the supervisor performs a reference/integrity check with two referees before the job interview takes place: with his/her/their current and previous employer, or two previous different clients.

The candidate will be asked to agree to this.

- Anyone entering into an employment or cooperation contract for a definite or indefinite period of time with the Liliane Fonds and/or MIVA must provide a Certificate of Conduct (*Verklaring omtrent gedrag*, or VOG). The Liliane Fonds/MIVA will reimburse the costs for this. The requirement for a VOG also applies to self-employed persons, volunteers, consultants, ambassadors, external workers who travel on behalf of the Liliane Fonds and/or MIVA, for example, and other hired staff. Once employed, employees must renew the VOG certificate after four years. For self-employed persons and/or consultants, they are required to renew a VOG certificate after two years.
- HR discusses the content of the Code of Conduct during the job interview This provides an opportunity for the new employee to discuss any dilemmas from his/her/their past.
- A clause has been added to the employment contract in which each employee subscribes to the Code of Conduct
- New volunteers also sign the Code of Conduct which they receive at the same time as the volunteer agreement.
- New employees and volunteers are required to attend an introductory meeting that takes a more in-depth look at integrity.
- Mandatory awareness sessions for employees and volunteers on integrity are organised every year. Deliberations on moral issues are also regularly held.

## **1. Code of Conduct (appendix 1)**

The Code of Conduct has been prepared as a document that every employee and others working for or on behalf of the Liliane Fonds and/or MIVA personally sign. It forms the frame of reference for the behaviour we consider desirable. The Code of Conduct does not contain an exhaustive list of concrete rules of conduct, but it is primarily a document containing values with the goal of engendering responsibility in each employee for their own actions. Part of the Code of Conduct also includes provisions on Child Safeguarding (appendix 2).

## **2. Child Safeguarding Policy (appendix 2)**

The Liliane Fonds/MIVA and its partner organisations have a Child Safeguarding Policy. The importance and protection of children with disabilities is paramount for the Liliane Fonds/MIVA and its partners. Children with disabilities are especially vulnerable to abuse, maltreatment or violence due to their physical or mental impairment. In working with children and their parents/carers and guardians, the Liliane Fonds/MIVA and its partners therefore have a special responsibility to ensure a safe environment where children are not at risk of abuse, maltreatment and violence and their rights are respected. What responsibility this is, how we manage it and what we do in case of (suspected) transgressive behaviour towards children, is described herein.

## **3. Discussion and reporting**

### **3.1 Discussion**

Before making a report, you can discuss the issue with your supervisor or HR. As a Liliane Fonds/MIVA employee or volunteer, you can also request a meeting with the internal or external confidential adviser (Hanne Aikema or Miriam Smit). The latter will listen, advise and keep the information obtained during the meeting confidential.

The function of internal and external confidential advisers is to handle cases of experienced or reported improper conduct. Confidential advisers can also be approached for misconduct, such as theft and fraud.

Employment law issues are not part of the confidential advisers' remit; these matters can be discussed by employees with their manager or HR adviser.

### **3.2 Reporting**

The Liliane Fonds/MIVA stress that making a report is important and necessary to combat improper conduct and hold the persons involved accountable.

The reporting point for all forms of improper conduct and misconduct is the Integrity Officer (email: [integrityofficer@lilianefonds.nl](mailto:integrityofficer@lilianefonds.nl) or [integrityofficer@miva.nl](mailto:integrityofficer@miva.nl)) or, for reports on child safeguarding, the Child Safeguarding Focal Point (email: [childsafeguarding@lilianefonds.nl](mailto:childsafeguarding@lilianefonds.nl)). The advantage of this is that it is always clear where to report – thus promoting low-threshold reporting .

Matters concerning improper conduct can be discussed or reported to the Integrity Officer or Child Safeguarding Focal Point. A report may be followed up informally. The report becomes an official complaint when it is formally followed up by the Improper Conduct Complaints Committee.

The Improper Conduct Complaints Committee consists of four members:

- an independent external chairperson;
- one member appointed by the OR;
- one member appointed by the Executive Director;
- the Integrity Officer.

In case the complaint concerns improper conduct involving children, the Child Safeguarding Focal Point is also part of the Improper Conduct Complaints Committee. The working method of the Improper Conduct Complaints Committee is further detailed in the Improper Conduct Complaints Regulations (appendix 3).

### **3.3 Complaints from the Dutch public or donors**

Complaints from the Dutch public or donors are reported to donor management (email: [voorlichting@lilianefonds.nl](mailto:voorlichting@lilianefonds.nl) or [info@miva.nl](mailto:info@miva.nl)). This is also stated in the general complaints procedure posted on the websites (appendix 6).

### **3.4 Whistleblower Procedure**

For (alleged) malpractice and in situations where the reporter is dissatisfied with the internal process, an external report can also be made in accordance with the Whistleblower Procedure (appendix 5).

Malpractice occurs when the public interest is at stake, for example when there is a threat to public health or the safety of persons.

## **4. Enforcement: Arrangements for non-compliance with the Code of Conduct or Child Safeguarding Policy (appendices 3, 4, 5)**

The Liliane Fonds and MIVA have in place an improper conduct complaints procedure (appendix 3), an anti-fraud protocol (appendix 4), and a whistleblower's procedure by which (suspicions of) improper conduct, fraud and abuse can be reported and dealt with (appendix 5). Each type of notification has its own procedure. There are also differences in the definition of the problem and preventive measures.

Incidentally, with regard to fraud, we design our (financial) processes to minimise the opportunity for fraud. These processes are beyond the scope of this policy.

## 5. Other complaints and regulations

### Employment law issues or internal complaints about policies

We have not drawn up separate regulations for employment law issues or complaints from employees about Liliane Fonds and/or MIVA policies.

- You can report employment law issues to your supervisor and/or the HR adviser. If the handling of employment law issues has not been handled satisfactorily, you can report it to the Executive Director.
- In the case of a reorganisation, the social plan describes where and how to file an objection.
- As an employee, you can report complaints about Liliane Fonds/MIVA policies to your supervisor, and complaints of a general nature can be reported to the Executive Director. They will discuss with you how these complaints will be handled.

### Submission and handling of general complaints from external parties (donors, etc.)

The Liliane Fonds and MIVA have a general complaints regulation. These regulations are for general complaints or dissatisfaction by external parties about the Liliane Fonds or MIVA or about a service or product provided by the Liliane Fonds or MIVA. The procedure and handling can be found in the general complaints regulations on the website (appendix 6).

## 6. Regulations for (S)POs

The reporting point for improper conduct for employees of (S)POs is also the Integrity Officer (email: [integrityofficer@lilianefonds.nl](mailto:integrityofficer@lilianefonds.nl) or [integrityofficer@miva.nl](mailto:integrityofficer@miva.nl)). In case of improper conduct towards children, it is the Child Safeguarding Focal Point (email: [childsafeguarding@lilianefonds.nl](mailto:childsafeguarding@lilianefonds.nl)).

Suspicions of fraud and improper conduct can be reported and dealt with through the anti-fraud protocol, the improper conduct complaints procedure and the Child Safeguarding Policy.

For general complaints about the policies of the Liliane Fonds and/or MIVA, and for reporting and dealing with malpractice (from countries outside the EU), the 'Complaints and Whistleblowing Policy for SPOs' applies (appendix 7). Malpractice occurs when the public interest is at stake, for example in the case of danger to public health or to the safety of persons.

## 7. Reports and contact details

The confidential advisers, the Integrity Officer (also on behalf of the Improper Conduct Complaints Committee) and the Child Safeguarding Focal Point annually report to the Executive Director in broad-strokes qualitative and quantitative terms on the reports they have dealt with. The Executive Director shares this report with the Works Council and with the Supervisory Board. The number of reports, the nature of the reports and their handling are also published on the website and in the annual report. Based on the report, the Executive Director determines annually how the issue of integrity should be spotlighted within the organisation.

Internal confidential adviser: Hanne Aikema, [Internevertrouwenspersoon@lilianefonds.nl](mailto:Internevertrouwenspersoon@lilianefonds.nl)

External confidential adviser: Miriam Smit, 06 - 21 39 74 42 [info@humanresults.nl](mailto:info@humanresults.nl)

Integrity Officer (hotline): Quality Officer, [integrityofficer@lilianefonds.nl](mailto:integrityofficer@lilianefonds.nl) or [integrityofficer@miva.nl](mailto:integrityofficer@miva.nl)

Child Safeguarding Focal Point (hotline): [childsafeguarding@lilianefonds.nl](mailto:childsafeguarding@lilianefonds.nl)

## Appendix: Definitions

a. **Employee:** anyone who carries out activities on behalf of or for the Liliane Fonds and/or MIVA or has carried out activities over the past two years. The nature of the job is irrelevant in this case. This therefore does not only concern permanent or temporary employees, interns, self-employed persons and other hired staff, but also about volunteers, consultants and other external parties with whom the Liliane Fonds and/or MIVA work together.

b. **Improper Conduct Complaints Committee:** the internal committee responsible for handling complaints about improper conduct. This committee consists of:

- An independent chairperson
- A member appointed by the employees (through the Works Council)
- A member appointed by the Executive Director
- The Integrity Officer, who is the reporting point for the committee (and in the case of a report of improper conduct involving children, the Child Safeguarding Focal Point)

The members (except the Integrity Officer and Child Safeguarding Focal Point) are appointed for a period of 2 years. After termination, this can be extended for one period of two years.

c. **Child Safeguarding Focal Point:** the person appointed by the Liliane Fonds and MIVA who is responsible for supporting and monitoring the Child Safeguarding Policy and for receiving and dealing with reports of improper conduct involving children.

d. **Confidential adviser:** those appointed by the Liliane Fonds and MIVA to act as such. The confidential adviser is the person to whom an employee/other person can tell his/her story about improper conduct. The confidential adviser listens, thinks and offers support to stop the improper conduct, and can also offer support in filing a complaint. The confidential adviser also provides after-care after complaint handling.

e. **Report/complaint:** reporting to the Integrity Officer or Child Safeguarding Focal Point or filing a complaint about a situation of improper conduct. When filing a complaint, the procedure as described in appendix 3 will be followed.

f. **Improper conduct:** this includes bullying, (sexual) harassment, aggression, violence and discrimination.

Improper conduct towards children in programmes organised or funded by the Liliane Fonds/MIVA or the (S)POs is described in more detail in the Child Safeguarding Policy.

g. **(Sexual) harassment:** direct or indirect (sexual) utterances in word, gesture, image, behaviour or otherwise, which the person concerned (m/f) comes into contact with in the work situation and

that are perceived by her or him as threatening. (Sexual) harassment can be done both by persons inside and outside the Liliane Fonds and/or MIVA.

h. **Discrimination:** being disadvantaged on grounds such as race, religion, gender, sexual orientation, illness and/or disability, age and ethnic origin.

i. **Bullying in the workplace:** hostile, intimidating or humiliating behaviour, in which the same employee or employees is/are the target of this behaviour. The behaviour occurs frequently and persists for longer periods of time. This may also involve a disproportionate balance of power and/or force between the attacking party and the targeted employee.