



Integrity Policy

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Annexes¹

- Annex 1: Help a Child Code of Conduct
- Annex 2: Child safeguarding Policy
- Annex 3: Anti-Fraud & Corruption Policy
- Annex 4: Feedback, Complaints and Whistle Blowing Procedure
- Annex 5: Confidential Counseling

¹ The listed annexes are separate files (saved online and on SharePoint). This Integrity Policy also includes a reference to the HR Policy and Employee Handbook, which, are separate policy documents.



1. Purpose and Scope

Help a Child provides a future for children in need, their family, and their entire community. As a Christian non-profit organization Help a Child wants every child – regardless of their social, political, religious, ethnic, or economic background – to have a life in dignity, with love and with a promising future.

This policy document sets the basis for the organization's position on how it acknowledges and should manage any integrity-related risk with the aim to prevent integrity issues from happening, and when occurring, to take adequate action. The Integrity Policy with its annexes aims to provide clear guidance on what we expect of each other. It describes acceptable standards of behavior and promotes good practice for everyone representing Help a Child.

The policy is in line with the integrity standards of the Dutch network Partos, Goede Doelen Nederland and the Dutch Relief Alliance; and aligns with the Core Humanitarian Standards, and the ICRC code of conduct. Help a Child participates in the [Inter-Agency Misconduct Disclosure Scheme](#) and is a full member of the [CHS Alliance](#) as well as the [Keeping Children Safe Alliance](#).

We expect everyone who represents Help a Child to comply with international law and to uphold the highest standards of integrity. Everyone is personally and collectively responsible for upholding and promoting these standards of ethical and professional conduct. Each of us, in all aspects of our work, is an ambassador of Help a Child and will frequently work in positions of authority and trust. Help a Child expects its representatives to always behave in a manner that represents Help a Child's mission and beliefs and core values. If only one of us acts in a way that is inconsistent with our values and principles, the impact on our reputation may mean we fail to achieve our objectives. We expect everyone who represents Help a Child, collectively referred to as staff or employees, to adhere to this Integrity Policy, including its annexes:

- Contracted staff
- Consultants
- Volunteers, trainees, and interns
- Or anyone else who acts on behalf of Help a Child

This policy forms part of all contracts of employment or conditions of service and all representatives of Help a Child are expected to sign the Integrity Policy before conducting any activities on behalf of Help a Child.



2. Meaning of Integrity

2.1 Integrity in general

Based on our organizational core values Help a Child expects its employees to behave with integrity; meaning to do no harm and to carefully consider the rights and interests of others. Working with Help a Child should occur within an atmosphere of mutual trust and commitment. It means a safe environment, in which everyone behaves responsibly and is willing to account for their conduct. Nobody should feel excluded, and inclusiveness is general. It also means handling confidential and privacy-sensitive information with discretion.

Working with Help a Child implies an obligation to the organization, its donors as well as its target groups. Decisions should be carefully prepared, considering the interests and vulnerabilities of all these parties. Employees must use power, resources and information in a responsible manner and must be guided by what serves the public interest, and most of all the dignity and protection of human beings. They must be able to resist temptations and to avoid risky situations. They should carefully consider legitimate rights, interests, and expectations, including in situations where it is not (immediately) clear what is the right choice.

Acting with integrity takes place in day-to-day practice and is not bound to a person's workplace and contracted hours. In our digital world with its flexible methods of working, the separation between work and private life has become less clear. It is therefore important for employees to be aware that private behavior can have a negative impact on their acting as a good employee and may harm their employer.

However, not only the employee has an obligation, but also the organization is expected to be a 'good employer' and has a 'duty of care'. The employer will respect the employees' rights, and not abuse its position of authority. Help a Child aims to ensure good working conditions and a safe working environment. Help a Child is responsible for creating a safe environment in which integrity issues can be discussed and promote awareness of what is meant by acting with integrity. Also, Help a Child highly values respect for people and their private lives, the absence of discrimination (e.g. based on ethnicity, religion, gender, age, sexuality and culture), and the protection of health and safety.

Regarding the people Help a Child supports, the organization aims to provide them with high quality support and to refrain from harmful interventions and communications when preparing, facilitating, implementing, monitoring, and evaluating, learning, and phasing out its programs. It complies with international law and respects cultures and traditions as well as the country's sovereignty. When it comes to other stakeholders, such as partner organizations and donors, Help a Child aims to be compliant to all regulations by implementing good governance practices as well as reliable and relevant communications and data.



2.2 Do No Harm

It is one of Help a Child's highest priorities to protect our beneficiaries from harm. Therefore, all representatives of Help a Child are expected to adhere to the protection principles as mentioned in the [Sphere Handbook](#) and derived from the Humanitarian Charter, although they also apply to a development context.

Protection principles:

1. *Avoid exposing people to further harm as a result of your actions.*
Meaning: those involved in humanitarian response take steps to avoid or minimize any adverse effects of their intervention, in particular the risk of exposing people to increased danger or abuse of their rights.
2. *Ensure people's access to impartial assistance – in proportion to need and without discrimination.*
Meaning: people can access humanitarian assistance according to need and without adverse discrimination. Assistance is not withheld from people in need, and access for humanitarian agencies is provided as necessary to meet the Sphere standards.
3. *Protect people from physical and psychological harm arising from violence and coercion.*
Meaning: people are protected from violence, from being forced or induced to act against their will and from fear of such abuse.
4. *Assist people to claim their rights, access available remedies and recover from the effects of abuse.*
The affected population is helped to claim their rights through information, documentation and assistance in seeking remedies. People are supported appropriately in recovering from the physical, psychological and social effects of violence and other abuses.

2.3 Preventing Sexual Exploitation, Abuse (PSEA)

All staff and programme participants should be treated with dignity and respect. In this regard, Help a Child gives particular attention to preventing sexual exploitation, and abuse (PSEA) and follows the core principles of the [IASC](#), which are further explained in the Code of Conduct, annex 1. Help a Child has a zero-tolerance policy when it comes to sexual harassment, exploitation and abuse. As mentioned, Help a Child participates in the Inter-Agency Misconduct Disclosure Scheme.

2.4 Child safeguarding

'Child safeguarding' is the responsibility that Help a Child has to ensure their employees and operations do not harm children; that it does not expose children to the risk of harm and abuse, and that any concern the organization has about children's safety within the communities in which they work, is reported to the appropriate authorities².



All forms of abuse and exploitation suffered by children are unacceptable. Children need to be protected from harm and supported in an enabling environment in which children can develop holistically. Also, we believe all children have equal rights to be protected including those who are disabled, who are from minority ethnic/faith groups, and regardless of gender, sexuality and culture.

[Help a Child's Child Safeguarding Policy](#), to be found in [annex 2](#), clearly emphasizes the rights children have to be protected from abuse and exploitation. It sets out the responsibility Help a Child has to ensure that all representatives of Help a Child and Help a Child's partners are given guidance about the standards of behavior and practice required of them at all times when they are in contact with children. The policy also formulates guidelines for incorporating Child Protection into programs and other work.

In line with our vision and mission, we acknowledge the protection of children is a human right. The Child Safeguarding Policy is, therefore, based on the UN Convention on the rights of the child. To align with internationally recognised standards and good practice Help a Child has become a full member of the [Keeping Children Safe Network](#) and is committed to meet Keeping Children Safe's standards for child protection.

Any child protection issue caused by anyone who is not an employee or other representative of Help a Child, is outside the scope of this policy. It needs to be dealt with through the (community) child protection mechanism in the local context, or any other local authorities or protection systems in place. Help a Child however, will support the set-up or strengthening of these community protection mechanisms, for as much as possible.

2.5 Financial integrity

Help a Child aims to ensure that the organization manages its finances responsibly, and to be transparent in how the money is used to carry out its mission. Help a Child not only aims for donor accountability and addressing expectations of donors, but also wants to be accountable to its employees and the people it supports. Help a Child expects its employees and others working on behalf of the organization to commit to lawful and ethical behavior, also when it comes to financial management and the organization aims to prevent and act upon financial misconduct.

More on Help a Child's norms, values and rules regarding financial integrity can be found in [Help a Child's Anti-Fraud and -Corruption Policy in annex 3](#).



3. Prevention and awareness plan

Preventing a breach of code of conduct, such as sexual abuse, exploitation and other forms of misconduct, is far better than *responding* to it. There are several ways in which Help a Child's is working on prevention, including background and reference checks of candidates, as part of the hiring process. Help a Child participates in the Inter-Agency Misconduct Disclosure Scheme³, which means that all reference checks include a written questionnaire. This will be sent to past employers about misconduct like sexual exploitation, abuse or harassment. Granting references by Help a Child will be subject to the Scheme as well.

Another way of prevention is providing new employees with training on Help a Child's Integrity Policy as well as frequent reminders and follow-up by the Integrity Focal Points and Integrity Coordinator. It is Help a Child's duty to create awareness among its staff, partners, and target communities about their rights and what to do to claim those rights and report misconduct. For communities, this is captured in our Community Based Complaints and Feedback Mechanism.

An integrity audit is incorporated in the regular internal audits conducted in all Help a Child offices and among each partner organization. Results of these audits will be used as learnings on which improvements of the organization's integrity procedures will be based.

This chapter describes further what Help a Child will do in its efforts to prevent misconduct and to ensure awareness on the Integrity Policy, including the ways to report misconduct, is created among its own employees and people participating in its projects.

3.1 Help a Child Integrity Team

The Help a Child Integrity Team consists of the Integrity Coordinator, Integrity Leadership Team, and the Integrity Focal Points.

Integrity Coordinator

Help a Child assigned a corporate Integrity Coordinator to lead the international Integrity Team. The integrity coordinator is responsible for the following (based on the job description):

- leading the Help a Child Integrity Team, consisting of Integrity Focal Points who are each based in a Help a Child country office;
- building the capacity of the Integrity Focal Points based on the training plan and integrity policy;
- ensuring awareness is created among employees on the organization's integrity policy and procedures;
- reviewing the Integrity Policy every two years;
- coordinating and monitoring implementation of the Integrity Policy;
- analyzing and coordinating follow up on integrity issues being reported; and
- together with the management, take part in risk assessment and audits, focus on vulnerabilities.

- the Integrity Team, consisting of the Integrity Coordinator and all the country Integrity Focal Points, meets at least two times a year via Teams or during the Strategic Consultation Meetings (SCM) to discuss (fictional) cases, policy implementation and whether the policy needs to be updated.

Integrity Leadership Team

When integrity issues are reported, the Integrity Coordinator can involve members of the wider Integrity Leadership Team. This team consists of the Child Safeguarding Expert, Finance Manager, and the CEO, if required. In some cases, this may also involve the PMEAL Coordinator and the person responsible for CHS (Quality and Accountability). This Integrity Leadership Team, led by the Integrity Coordinator, is also responsible for the review of the Integrity Policy, every two years, and earlier if necessary. Every 1st and 3rd quarter the team will have a review meeting.

Integrity Focal Points

In each Help a Child country office one person is being selected to fulfill the role of Integrity Focal Person. This focal person has the following tasks:

- Ensuring all Help a Child employees, consultants, trainees, interns and volunteers and integrity focal point of partner organizations are aware of the Help a Child integrity principles and procedures at country office level;
- building capacity of staff and integrity focal point of partner bi-annually;
- coordinating and monitoring implementation of the Integrity Policy at country level;
- providing the Integrity Coordinator with bi-annual monitoring reports and feedback to be used as input for the Integrity Policy review;
- handling reported integrity incidents or concerns as described in annex 4; and
- ensuring community awareness on integrity issues and mechanism of reporting is being created.

Countries without Help a Child Office

In some countries, Help a Child works solely through partner organizations without having a permanent presence in the country. These partner organizations will follow their own integrity procedures, however, Help a Child ensures capacity to uphold a high standard of integrity by including this in partner assessments and internal audits. In case the partner cannot fully comply to Help a Child's Integrity requirements, the Integrity Coordinator will be requested to advice and support.



3.2 Employees recruitment and capacity building

To ensure that the organization's operations both at office and field level are of a high standard of integrity, Help a Child implements specific procedures when it comes to recruitment of new staff and anyone who acts on behalf of Help a Child and invests in capacity building.

Recruitment

All Help a Child applicants are informed via the published job vacancy and during job interviews about Help a Child's expectations and standards of working regarding integrity, as well as the applicant screening steps. Applicants are interviewed at least twice, by multiple persons, preferably face-to-face, and these interviews cover explicit questions on integrity. For all Help a Child staff positions a criminal record check and a reference check is part of the application procedure. References are conducted in line with the [SCHR Inter-Agency Misconduct Disclosure Scheme](#). Regarding consultants, trainees, interns and volunteers this is only required for high-risk positions/assignments (e.g. direct contact with children, managing finance, etc.).

This screening on integrity serves three goals: (1) demotivating people with wrong intentions to apply; (2) adequate screening of candidates during the application process and excluding candidates with an increased risk of unacceptable behavior; and (3) new employees understand how much importance the organization attaches to integer behavior.

When signing the employment contract, everyone will be required to sign the Help a Child Integrity Policy as part of this contract. More specific information on the procedures related to Help a Child's recruitment procedure can be found in the Help a Child HR Policy.

Should any concerns about someone's integrity arise during the probation period, the issue should be discussed with the line manager together with the HR Manager. The line manager together with the HR Manager will decide what action to take. Furthermore, when a staff member resigns an exit interview will be held to find out the reason of resignation.

Capacity building

Help a Child developed a training plan to schedule all necessary online and offline training for each of the staff members and others (such as consultants and board members) which clearly sets out which trainings are intended for whom, as well as when, and how often they should be attended. All new employees follow mandatory online courses on integrity and related topics during the first three months of their contract. Furthermore, to refresh knowledge and skills on integrity, bi-annually each Help a Child office team will hold an 'Integrity workshop'. This workshop will be prepared and led by the Line Manager for the teams in the Netherlands and in the countries by the Integrity Focal Point, or Integrity Coordinator. The workshop could start with a session on the main procedures mentioned in the Integrity Policy, which is followed by a more interactive session during which all staff

members will discuss various case studies on integrity issues, moral dilemmas and/or vulnerabilities and risks regarding integrity within the organization.

Depending on their assignment (e.g. having direct contact with beneficiaries), trainees, interns and volunteers will also receive training on integrity. Furthermore, any person travelling on behalf of Help a Child – e.g. Supervisory Board members, consultants – and visiting a Help a Child country office, a partner organization, and/or a Help a Child project site, will participate in an e-learning which will be part of the mandatory safety and security process steps. This should include an e-learning module on the Code of Conduct.



As mentioned in the previous section, the Integrity Coordinator will build the capacity of the organization's Integrity Focal Points. The Integrity Coordinator will make sure the focal points gain knowledge and understanding of:

- how to identify and respond to misconduct, including abuse and exploitation;
- where misconduct, including abuse and exploitation, can take place;
- the integrity risks in the organization and how to develop a mitigation strategy;
- security of (child) data and confidentiality;
- guidelines for child sponsorship, including sponsor visits;
- the procedure to follow if misconduct comes to light.

3.3 Procedures for partner organizations

When identifying our partners, extensive research takes place, covering an analysis of the culture/background of the partners' organizations and its decision makers, including documentation regarding anti-corruption/anti-fraud and (child)protection issues. This is part of a required Organizational Capacity Assessment. In addition, all partners of Help a Child have to adhere to the following minimum requirements regarding integrity:

- All partner organizations need to have policy and procedures on integrity (e.g. on recruitment, induction, etc.) in line with the Help a Child Integrity Policy.
- All partners need to have feedback and complaints reporting mechanisms in place and procedures for follow up on these reported issues (needs to appear from practice).
- All partners need to have a focal person for integrity.
- All partners need to ensure their employees know about and understand the policy and procedures on integrity.
- All partners need to raise awareness among project target groups about their organization's integrity policy and procedures, including the ways to report integrity issues. Also, the partner is expected to have guidelines in place on communication with children.

As said before, partners will be provided training on integrity by the Help a Child Integrity Focal Person – and by the Integrity Coordinator and the experts in case of countries without Help a Child office. This training will take place within one year after the partnership agreement/MoU has been signed. The training includes a session on Do No Harm Principles.

Besides capacity building of partners, monitoring on the implementation of the Help a Child Integrity Policy and procedures will also become part of the program audit, an audit which takes place at least once every two years, for each of the offices and partners.

Information on Help a Child's reporting procedures, also for partners, can be found in [annex 4 "Feedback, Complaints and Whistle Blowing Procedure"](#). Every partnership agreement is expected to mention the partner's obligation to report any breach of the Help a Child Integrity Policy (for example a breach by a Help a Child staff member).

3.4 Help a Child integrity strategy for communities

It is important to raise awareness among the communities Help a Child works with about the Integrity Policy and related procedures. This will help them, amongst others, to ensure they know their rights and responsibilities and know how to report concerns and/or complaints. Therefore, each new project will start with a community consultation regarding the preferred communication channels and an induction workshop on integrity and establish a fully functional Community Based Complaints and Feedback Mechanism (CBCFM). Help a Child country offices are expected to describe this process in their annual plans and to take this into account when developing project workplans and budgets. Not only at the start, but also throughout the project duration communities should be reminded of their rights, responsibilities, and ability to report. At the same time, it is important that they are also actively enquired about their opinions on the project, the staff, and any other topics on which they can give their feedback. The result will be a clear Community Based Complaint and Feedback Mechanism, with both pro-active and reactive channels in place, and followed up throughout the project by the project staff.

Integrity is important in all projects, also if they are not focusing on children only. Help a Child aims to make “integrity” a cross-cutting theme in every project. For cases of sexual exploitation and abuse, a local referral path is established, to be able to refer beneficiaries to protection services (e.g. medical services, legal services, psycho-social services, police, community development/probation office, community leaders), so that all cases of abuse within the community will be dealt with, not only cases where project employees are involved.

3.5 Staff care

Since Help a Child employees often work in more remote areas among people living in distress and often work far away from home, stress levels of employees might go up. People might have different ways to deal with this stress. There are positive coping mechanisms – sport, praying, sharing with friends, etc. – but there are also negative coping mechanism, such as drinking excessive amounts of alcohol. It is Help a Child’s duty of care to limit the amount of stress to which employees are exposed and to support employees in dealing with stress. Therefore, the following is provided for employees exposed to extra stressful situations:

- Good Rest and Recuperation (R&R) possibilities (e.g. employees being able to visit family regularly).
- Stress-management training (basic training on what employees and the office can do to deal with stress levels, e.g. providing a prayer room or sports facilities).
- Safety and security awareness training;
- Critical integrity incident support: in each Help a Child country of operation a few possibilities for (external) services will be selected, for support in case of any critical integrity incident. It is important for employees to feel supported and to get psychosocial care, which helps them to deal with the incident.



4. Reporting procedure and confidential counseling

Annex 4 covers the [Feedback, Complaints and Whistle Blowing Procedure](#), which describes the procedure Help a Child put in place to allow project participants, employees, partners and other stakeholders of Help a Child to share feedback, concerns and complaints on communications, actions and behavior related to our work, have them heard and properly addressed. Each person signing the Help a Child code of conduct is signing for the obligation to report any concern related to a breach of the Integrity Policy.

Help a Child has several reporting channels in place. Reports will be analyzed by the relevant country Integrity Focal Point, the Integrity Coordinator, or a person assigned by the Integrity Coordinator. Based on this analysis the Integrity Focal Point(s) involved, the Integrity Coordinator and the CEO will determine whether an investigation is justified. If investigation is required, an investigation team will be established, and investigation will take place. An alleged perpetrator is innocent until proven guilty.

Appropriate action will be taken if staff is found guilty. Depending on the severity appropriate actions might include termination of contract and legal action if required, as described in the employment conditions manual. Help a Child has a zero tolerance against sexual exploitation and abuse. Any substantiated and proven case of sexual exploitation and abuse will always lead to direct termination of employment.



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