



Annex 4

Integrity Reporting Procedure (for communities and partners)

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1. Introduction

This document about the Integrity Reporting Procedure constitutes annex 4 of the Help a Child Integrity Policy and is put in place to allow beneficiaries, staff, partners and other stakeholders of Help a Child to raise a concern for any actions that form a breach of the code of conduct of Help a Child.

This policy deals with concerns related to the organization's Integrity Policy raised after possible misconduct of any representative of Help a Child (e.g. staff, consultants, volunteers, trainees, interns, and group travel guides and participants). Also, it addresses concerns about possible misconduct by partner staff of Help a Child.

Annex 5 of the Integrity policy contains more information on Help a Child's Whistleblowing and misconduct reporting procedure for staff members who want to report an integrity concern or integrity complaint.

Definition:

- **Integrity Concern:** is an expression of concern by a beneficiary, community member, staff member or other stakeholder on an action that contains a possible breach of the code of conduct of Help a Child.
- **Integrity Complaint:** is an expression of dissatisfaction by a beneficiary or community member submitted through the Community Based Complaint and Feedback Mechanism that contains a possible breach of the code of conduct of Help a Child.

Integrity concern: is an expression of worry or unease by any stakeholder (beneficiary, community member, staff, or partner) regarding a potential breach of the code of conduct of Help a Child. It reflects a suspicion or observation that something may be amiss and potentially in violation of organizational standards. These concerns are typically reported through various internal channels and can be raised anonymously.

Integrity complaint: is a formal expression of dissatisfaction by a beneficiary or community member, highlighting a specific instance of potential misconduct that breaches the Help a Child code of conduct. This complaint is submitted through the Community-Based Complaint and Feedback Mechanism (CBCFM).



2. Reporting Channels

2.1 Conducive environment

Help a Child is committed to protect its beneficiaries and staff from any abuse and to provide an effective procedure for handling and responding to and addressing integrity concerns. It is important to work from an atmosphere of trust, confidence, and value orientation for this purpose where integrity concerns are welcomed and addressed. Guidance will be provided for staff and communities supported by Help a Child, to avoid ad hoc, defensive, negative responses and uncertainty about what is expected of staff in responding to concerns.

In each country with a Help a Child Country Office a focal person from the Help a Child country staff is selected: the Integrity Focal Point.

This person is responsible for ensuring that:

- Help a Child Staff and partner staff have good knowledge of the Integrity Reporting Procedure;
- Help a Child and partner staff who regularly receive feedback or concerns from community members know how to act when an integrity concern is received.

Part of this conducive environment is raising awareness about the existence of community-based concerns and feedback mechanisms as well as the internal reporting mechanisms.

Awareness could be raised amongst others by distributing posters, flyers, organizing workshops or meetings with communities.

2.2 Reporting Channels

Reporting channels for Help a Child staff and partner staff

Help a Child staff or partner staff can choose from several channels to report their concern to:

The management

- Filling out the below incident reporting form and sending it to their line manager.
- If line manager is involved, or if there is a need to escalate the concern, contact Integrity Team.

The Integrity Team

- Filling out the below incident reporting form and sending it to the country office Integrity Focal Point.
- Filling out the below incident reporting form and /or email to the Integrity Response Team (integrity@helpachild.org)
- Calling or whatsapp the country Integrity Focal Point (number should be revealed in country in the offices and on posters)



- Download the reporting form on the Help a Child website; then send it to the Integrity Response Team.

Community Based Feedback and Complaint Mechanisms (CBCFM)

At the start of every new project the type of reporting mechanisms used by the target community will be agreed upon together with community. Throughout the project all types of feedback and complaints can be received. Most complaints are likely to fall out of the scope of this policy. Only integrity complaints are part of the scope of this Annex.

An integrity complaint is an expression of dissatisfaction by a community member on an action that contains a possible breach of the code of conduct of Help a Child.

Examples of possible complaint mechanisms are:

- Concerns/ suggestion box;
- Phone/whatsapp;
- Community representatives;
- Community meetings;
- Through a trusted intermediary.

All complaints shared are confidential. All records/reports are kept in a secured folder with limited access. Disclosure of information only can be made to relevant parties on need to know basis.

The **CBCFM approach** is fully described in a separate document, including a community consultation **guide** to define which channels are appropriate and preferred.

Channel for anybody who wants to share an integrity concern

Both our Dutch and international website mention the organization's address, telephone number and email address of the Integrity Response Team.

Integrity concerns about partner organizations of Help a Child

When the concern is about a partner organization which is implementing a project on behalf of Help a Child, the concern should initially be addressed to the partner organization itself. Concerns about partner organizations always have to be reported to Help a Child who will review and assess whether concerns have been accurately handled.



3. Handling Integrity Concerns

This section describes the procedure to be followed in case an Integrity concern is received.

3.1 Communication of Integrity Concern

An integrity concern may be brought directly to the attention of a staff person. In case the person receiving the concern is not the designated focal point, the staff shall forward the concern to the Integrity Focal Person or to the line manager or to the Integrity Response Team using the abovementioned reporting channels.¹ This person will acknowledge receipt of the concerns and inform about the procedure.

Integrity concerns about (staff of) Help a Child need to be reported to the Integrity Focal point of the country office or if that is not possible to the Integrity Response Team.

It is possible to raise a concern anonymously, however it is preferable to have a way to contact the complainant, or a proxy: someone that can be contacted on behalf of the complainant.

If an integrity concern is raised about (staff of) a local partner, the partner always has to report the concern to the country office after receiving the concern. In case a concern is raised about (staff of) Help a Child, the country office always has to report the concern to the Integrity Response Team within 72 hours after receiving this.

Note: a **concern about PSEAH** needs to be reported to the Integrity Focal person within 24 hours, who then will inform the Integrity Response Team immediately.

3.2 Confidential Counseling

Help a Child assigned an Confidential Counselor to support people experiencing or witnessing misconduct by Help a Child's representatives and/or in our programs. Conversations between the Confidential Counselor and the person asking for advise are strictly confidential. The support includes: a listening ear; support in clarifying the type of misconduct experienced (e.g. moral protest, violation of integrity); advise on possible steps to be taken; support in making a decision related to this.

The Confidential Counselor is not the one to report to. The Counselor can refer to the reporting channels for violations of integrity. The person asking for advice from the Counselor can still choose not to report the issue. Annex 6 of the Integrity policy contains more information on Help a Child's confidential counselling.

¹ A concern about the Line Manager can be directed to the Integrity Coordinator or CEO, a concern about the Integrity Coordinator can be directed to the Line Manager or CEO, and a concern about the CEO can be directed to the Integrity Coordinator or the Supervisory Board (except for the Confidential Counselor).

3.3 Analysis of situation

Within one week after an integrity concern has been received by Help a Child a case description is made by the line manager, Integrity Focal Point or the Integrity Response Team. Note: in case of SEA this deadline will be 48 hours.!

In case of suspected fraud or corruption, this case description will be made by the Finance Manager as described by the Anti-Fraud and Corruption Policy. In case the concern relates to child safeguarding, this case description will be made by the Child Safeguarding Advisor. For a case description all related and relevant information needs to be included to be able to make a well-informed decision whether to investigate the allegation. This will be done by (at least) addressing the following questions:

- Does the concern relate to a breach of Help a Child's Integrity Policy, a violation of any of the Help a Child's policies and guidelines, or a violation of law?
- Is the complainant or anyone else immediately or potentially at risk?
- Is there sufficient information and evidence or is there a need to further investigate?
- At this point, is the allegation conclusive enough to take management action?
- Is there a sincere concern? The concern must be a genuine concern of the complainant, raised in good faith, and is not motivated with the intent for personal gain, personal interest or a grudge. If it is determined that the concern was not made in good faith, disciplinary measures can be taken.

The team analyzing the case has the option to request advice from the Finance Manager, (Child) Safeguarding Expert and/or the Integrity Coordinator. For issues at country level, it is the Integrity Focal Point of the Country with the Integrity Coordinator who decides based on the case description whether 1) an investigation is justified, 2) suspension of work of any of the staff is necessary (e.g. for safety and protection reasons); and 3) reporting to donor and/or authorities is needed. For issues at international level, it is the CEO together with the Integrity Coordinator who decides on these three factors. Suspension will always be done in a respectful and confidential way. The Integrity Focal Point will share the case report and his/her decision on an investigation with the CEO.

In case a child is involved in the allegation the *Child Safeguarding Policy* needs to be adhered to. In case of suspected fraud, the *Fraud and Anti-Corruption Policy* needs to be followed. Furthermore, if the complainant or anyone else involved is at immediate or potential risk, adequate action should be taken to ensure that they are protected from any possible (future) harm. A Contingency Fund is available to cover costs for the investigation to provide the required support (medical/psychosocial/legal/material) to the victim.

The complainant will be informed by the line manager or integrity focal point about the result of the analysis and the way forward. In such a case the staff of Help a Child is involved, the person(s) concerned will be informed beforehand about the allegation and the decision to carry out an investigation.



3.4 Investigation

If Help a Child decides to perform an investigation this investigation will start as soon as possible. The Integrity Coordinator, CEO and Integrity Focal Point of the Country will appoint a team to be responsible for the investigation. The composition of the investigation team will vary in different situations and depend on the nature of the concern and the people involved. The team generally consists of an Integrity Team member and the HR Manager. If a child is involved, the Help a Child International Child Protection Expert will be part of the team. In case of suspected fraud or corruption, the Help a Child International Finance Manager will be part of the team.

When the incident reported is related to SEA, the Integrity Focal person together with the Integrity response Team will seek advice and cooperation from the PSEA Network in the country.

The investigation is guided by the following principles:

- **Protection & Confidentiality:** investigation of reported incidents always prioritizes the protection and interests of the victims, complainants and the accused. When necessary, adequate support will be made available to them. All matters related to concerns are confidential.
- **Impartiality:** the investigation must be conducted in an unbiased, fair and respectful manner.
- **Accountability:** those who conduct the investigation must adhere to these guidelines and must record accurately and comprehensively the steps which are employed in conducting an investigation. The methods and techniques employed in the investigation must be appropriate for the circumstances and proportional to the objectives of the investigation.
- **Transparency:** Help a Child staff, partner staff and persons of the affected community know that this procedure exists and know how to access those involved in conducting the investigation procedure.

3.5 Follow-up

The investigation team must write an investigation report. This is a summary that should address all aspects of the investigation, including how the alleged misconduct was discovered, the steps taken to gather the evidence, the investigator's conclusions and the evidence supporting those conclusions. The conclusion of the investigation must be clearly stated in the investigation report. The investigation team will submit the investigation report to the Help a Child Management Team (MT) for consideration and approval. This should demonstrate and document that the concern has been well investigated, relevant authorities have been informed (if appropriate) and interest and rights of the victim, complainant as well as alleged perpetrators have been respected during the entire investigation process.



Based upon the investigation report, and within one week of receiving the report, the MT will decide upon the appropriate action. The complainant will be informed about the result of the investigation.

3.6 Sanctioning

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 HR Policies.

Help a Child has a zero-tolerance policy against physical sexual exploitation and abuse. Any substantiated and proven case of physical sexual exploitation and abuse will always lead to direct termination of employment.



4. Incident Reporting Form

CONFIDENTIAL: Please restrict access to this document and keep it stored safely (e.g. using passwords or encryptions for computers and lock offices when unattended). For SEA cases; always use code names when referring to individuals involved in the case, omit information that could reveal identities (e.g. date of birth, address, phone number, description of unique physical traits) and keep information on the identity and personal details of persons involved separate from incident and related reports.

Name of person reporting

| | |
|-------------------|--|
| Name | |
| Age | |
| Gender | |
| Specific needs | |
| Contact details | |
| Date of reporting | |
| Reporting channel | |
| Date of incident | |

Description of the integrity concern

| | |
|---|---|
| What happened? | |
| <i>Where did it happen?</i> | <i>Exact location</i> |
| <i>When?</i> | <i>Date and time</i> |
| Who was involved as alleged staff/trainee /intern/consultant/ volunteer of HAC? | <i>Description of alleged or suspected perpetrator(s) (e.g. name, age, gender, nationality, organizational affiliation/position, previous record of misconduct)</i> |
| If any, what are details of the child involved? | |
| Any other witnesses? | |



Intervention so far

| | |
|-----------------------|---|
| What was done so far? | <i>(e.g. referral for assistance, referral to local authorities, investigations, notification of UN/Host Government):</i> |
|-----------------------|---|

Action taken by Help a Child (Country director and Management Team)

| | | | | |
|---------------------------------|---|---------------------|---------------------|-------------------------------|
| Case report built | <i>Name, title, contact details</i> | | | |
| Investigation of the situation | | | | |
| Support for victim arranged | | | | |
| Accused staff member heard | <i>If yes, add date and names of involved staff.</i> | | | |
| Support from partners requested | <i>(e.g. support for SEA survivors, investigations)</i> | | | |
| Action taken | | | | |
| Status of allegation | Not valid, dropped | Internally referred | Under investigation | Referred to legal authorities |

5. Referral Form

CONFIDENTIAL: Please restrict access to this document and keep it stored safely.

Note: Please share copies of filled out referral forms with the survivor and receiving agency and keep a copy for the organization's internal records and follow-up.

Referring agency

Agency/org: Contact:

Phone: Email:

Location

Receiving agency

Agency/org: Contact:

Phone: Email:

Location

Survivor information

Name: Phone:

Address: Age:

Gender Nationality:

Language: ID number

If survivor is a minor (under 18)

Name of primary caregiver: Relationship to child:

Contact information for caregiver: Is child separated or unaccompanied? Yes
 No

Caregiver is informed about referral? Yes No (If no, explain)

Background Information/Reason for referral and services already provided

Has the survivor been informed of the referral?

Yes No (If no, explain below)

Has the survivor been referred to any other organization?

Yes No (If yes, explain below)



Services requested

- | | | |
|---|--|---|
| <input type="checkbox"/> Mental Health Services | <input type="checkbox"/> Protection Services | <input type="checkbox"/> Shelter |
| <input type="checkbox"/> Psychosocial Support | <input type="checkbox"/> Legal Assistance | <input type="checkbox"/> Material Assistance |
| <input type="checkbox"/> Social Services | <input type="checkbox"/> Education | <input type="checkbox"/> Nutrition |
| <input type="checkbox"/> Medical Care | <input type="checkbox"/> Livelihood Support | <input type="checkbox"/> Support for children born as a result of SEA |

Please explain any requested services:

Consent to release information. (Read with survivor/ caregiver and answer any questions before they sign below. Sign on behalf of survivor/caregiver if consent is given verbally and survivor/caregiver cannot sign.)

I, _____ **(survivor name)**, understand that the purpose of the referral and of disclosing this information to _____ **(name of receiving agency)** is to ensure the safety and continuity of care among service providers seeking to serve the client. The service provider, _____ **(name of referring agency)**, has clearly explained the procedure of the referral to me and has listed the exact information that is to be disclosed. By signing this form, I authorize this exchange of information.

Signature of responsible party (survivor or caregiver if a child):

Date (DD/MM/YY):

Details of Referral

Any contact or other restrictions? Yes No (If yes, please explain below)

Referral delivered via: Phone (emergency only) E-mail Electronically (e.g., App or database) In Person

Follow-up expected via: Phone E-mail In Person. By date (DD/MM/YY):

Information agencies agree to exchange in follow up:

Name and signature of recipient:
(DD/MM/YY):

Date received

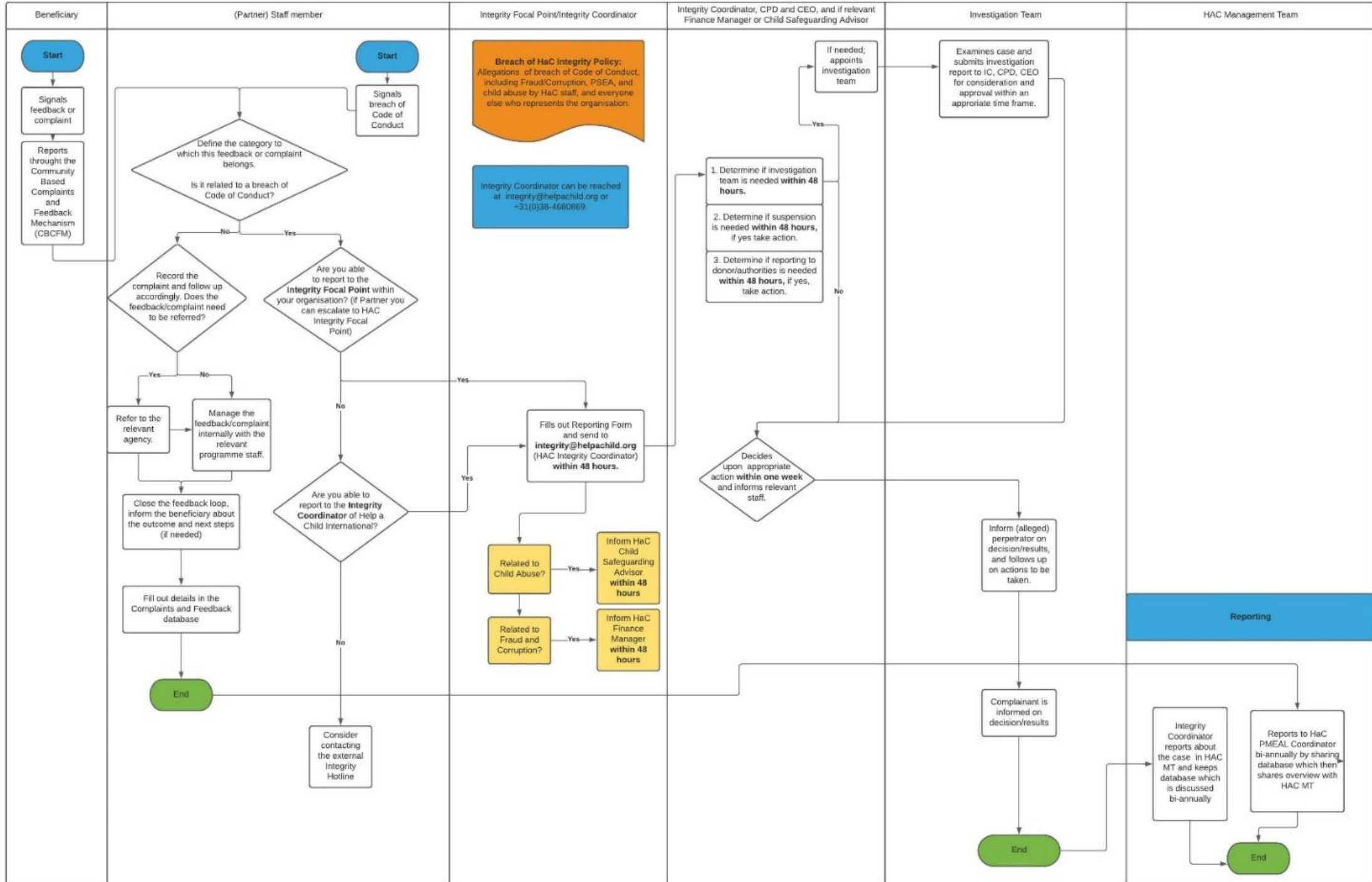


6. Reporting and Response Flowchart

On the next page you can find the reporting and response flowchart.



Integrity Flow Chart



Help  a
CHILD