



# **Help a Child Integrity Policy**

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### Annexes<sup>1</sup>

- 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

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<sup>1</sup> The listed annexes are separate files (saved on Sharepoint). This Integrity Policy also includes a reference to the HR Policy, which is a separate policy document, as well as, a reference to the Employment Conditions Manual, which is also a separate document (both documents can be found on Sharepoint).

## 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 networks Partos, Goede Doelen Nederland and the Dutch Relief Alliance; and aligns with the Core Humanitarian Standards, the ICRC code of conduct as well as the standards of the Keeping Children Safe Alliance.

We expect everyone who represents Help a Child - including employees, consultants, trainees, interns and volunteers - to comply with international law and to uphold the highest standards of integrity. We are all 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. This Integrity Policy, including its annexes, are therefore mandatory for all who represent Help a Child, including:

- Help a Child employees
- Consultants
- Volunteers stationed in any Help a Child office
- Trainees and interns stationed in any Help a Child office

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 [Help a Child Code of Conduct in annex 1](#) before conducting any activities on behalf of Help a Child.

Persons other than the abovementioned who visit Help a Child employees, partner employees and/or programs in the field on behalf of Help a Child are obliged to read, sign and adhere to a code of conduct before travel.

This policy and its annexes will give attention to areas which are subject to more specific norms and rules. Chapter 2 will describe what Help a Child means with "integrity" and chapter 3 shows Help a Child's plan on how to prevent misconduct and on how to create awareness on the integrity policy and procedures. Chapter 4 covers an introduction to Help a Child's "feedback, complaints and whistleblowing procedure" and talks about "confidential counseling".

The code of conduct in annex 1 helps to clarify what is meant by acting with integrity and annex 2 covers Help a Child's "Child Safeguarding Policy". Annex 3 includes the Help a Child's "Anti-Fraud & Corruption Policy" and annex 4 describes Help a Child's "Feedback, Complaints and Whistle Blowing Procedure", which includes Help a Child's integrity issue reporting procedures. Annex 5 closes with the Confidential Counselling procedure.

## 2. Meaning of Integrity

### 2.1 Integrity in general

Based on its organizational core values Help a Child expects its employees to behave with integrity; meaning to do no harm and to carefully take into account the rights and interests of others takes. Working with Help a Child should occur within an atmosphere of mutual trust and commitment. It means a socially 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, taking into account the interests and vulnerabilities of all of these parties. Employees must use powers, 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 interpret both the letter and spirit of rules, and carefully consider legitimate rights, interests and expectations, including in situations where it is not (immediately) clear what the right choice is. Employees should also be willing to have their deliberations reviewed (either beforehand or afterwards) and to account for them.

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'. Help a Child has a duty to behave properly towards its employees, respects their rights, and to not abuse its position of authority. The organization aims to ensure good working conditions and a safe working environment. A comprehensive integrity policy is an essential part of this duty of care. This means, among other things, that the employer must protect its employees against integrity risks by structuring its organization and work processes accordingly, putting in place the required facilities (e.g. assigning a confidential advisor), and creating rules regarding attitude and conduct (such as a Code of Conduct). Help a Child is responsible for creating a socially safe climate so that integrity issues can be discussed and to promote awareness of what is meant by acting with integrity. Also, Help a Child attaches significant importance to the respect of people and their private lives, to the absence of discrimination (e.g. based on ethnicity, religion, gender, age, sexuality and culture), and to the protection of health and safety.

With regard to 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 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 works hard to continue to deserve their trust, thanks to 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 the people the organization works with from harm. Therefore, all representatives of Help a Child are expected to adhere to the protection principles as mentioned in the Sphere Handbook<sup>2</sup> and shortly stated below. The principles are further elaborated upon in the Help a Child Code of Conduct in annex 1.

Protection / Do No Harm 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 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 authorities<sup>3</sup> (if present).

Help a Child believes that 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](#)*, is a guideline which 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.

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<sup>2</sup> <http://www.spherehandbook.org/en/how-to-use-this-chapter-5/>

<sup>3</sup> Keeping Children Safe

Next to our biblical motivation, we acknowledge the protection of children is a human right issue. 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 an associate member of the Keeping Children Safe alliance and is committed to meet Keeping Children Safe standards for child protection ([www.keepingchildrensafe.org.uk](http://www.keepingchildrensafe.org.uk)).

It needs to be said that any child protection issue caused by another person then a employees or other representative of Help a Child as mentioned in chapter 1, is not dealt with through this policy. It needs to be dealt with through the (community) child protection mechanism in the local context.

## 2.4 Financial integrity

Help a Child expects from all persons working on behalf of Help a Child to uphold the organization's financial integrity. This means that Help a Child finds it important to ensure that the organization manages its finances responsibly, and that the financial image it presents is not only technically accurate but is also 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 the organization to commit to lawful and ethical behavior, also when it comes to financial management and the organization aims to prevent and take action upon financial misconduct. Examples of financial misconduct<sup>4</sup>:

### *Misconduct for material gain*

Amongst others: theft, bribery, misuse of official position to get personal favors; giving unfair advantage to a contractor, consultant or supplier; misuse of Help a Child's resources or facilities for private purposes.

### *Conflict of interest*

For example: failing to declare a financial interest in a venture; intervening in a decision on behalf of a friend or a relative; improper involvement of a family business; or misuse of information for personal gain.

### *Waste or mismanagement of resources*

Indicates waste of organization funds, inadequate record keeping, negligent purchases or leases.

### *Defective administration*

Includes incompetent or negligent decision making; failure to correct serious mistakes; endangering funds; acting against organizational policy, regulations or laws.

### *Perverting justice or accountability*

Includes covering up poor performance; misleading or false reporting of activities of Help a Child; covering up corruption; hindering an official investigation; unlawfully altering or destroying official records.

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

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<sup>4</sup> Examples of misconduct as used by the Oak Foundation Financial Integrity Policy, May 2016.

### 3. Prevention and awareness plan

*Preventing* abuse, exploitation and other forms of misconduct is far better than *responding* to it. Part of this prevention is Help a Child's responsibility to prevent people with bad intentions from working on behalf of the organization. Such efforts should include proper screening of new employees (e.g. using reference checks), and providing new employees with training on Help a Child's Integrity Policy. It is important that employees are aware of their own behavior and the effects of this behavior, and that they know and do understand what Help a Child does perceive as acceptable and not acceptable behavior.

At the same time, it is Help a Child's duty to create awareness among its target communities about their rights and what to do to claim those rights and report misconduct. For instance, are communities aware of the fact that they are entitled certain services without having to pay for it in cash or in kind? Are they aware that NGO employees are not allowed to use their power to refuse services to certain people because they are part of a specific ethnic or religious group? Are they aware about the existing mechanisms to report, if such incidents happen?

An integrity audit is part of the regular 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

##### *Help a Child International*

HaC has several offices: in The Netherlands, in several countries in Africa, and in India. In its International Office in the Netherlands, Help a Child assigned a Coordinator Integrity to lead the organization's Integrity Team. This person is responsible for the following:

- 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 abovementioned Integrity Focal Points<sup>5</sup>;
- ensuring awareness is created among employees on the organization's integrity policy and procedures;
- reviewing the Integrity Policy on a bi-annual basis;
- coordinating and monitoring implementation of the Integrity Policy;
- analyzing and coordinating follow up on integrity issues being reported; and
- together with the management, setting up a description of the integrity vulnerabilities of processes and positions within the organization.

When integrity issues are reported, the Coordinator Integrity will involve the (Child) Protection Expert, Finance Manager and/or a person responsible for HR, if required.

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<sup>5</sup> All focal persons are being trained by the Coordinator Integrity in the Help a Child procedures and principles of integrity in humanitarian as well as development settings, the Core Humanitarian Standards and the Do No Harm principles (3-day training).

### *Help a Child country offices*

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

- building the capacity of all Help a Child employees, consultants, trainees, interns and volunteers and employees of partner organizations on Help a Child integrity principles and procedures at country office level;
- coordinating and monitoring implementation of the Integrity Policy at country level;
- providing the Coordinator Integrity with 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 methods of reporting is being created.

### *Countries without Help a Child Office*

In some countries in Africa, Help a Child works solely through partner organizations without having a permanent presence in the country. Although these partner organizations will follow their own integrity procedures, the Coordinator Integrity will ensure these partners are built in their capacity to uphold a high standard of integrity.

The Integrity Team, consisting of the Coordinator Integrity and all the country Integrity Focal Points, meets at least two times a year via Skype to discuss policy implementation and whether or not the policy needs to be updated.

## **3.2 Employees recruitment and capacity building**

In order 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 employees (including consultants, trainees, interns and volunteers) and capacity building of all persons working on behalf of Help a Child.

All Help a Child job 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 related to this. Job applicants are interviewed multiple times 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 is part of the application procedure, if possible. With regard to consultants, trainees, interns and volunteers this is only done 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 the new to be hired person will be required to sign the Help a Child Code of Conduct (annex 1) as part of this contract. In general, all persons working on behalf of Help a Child will receive the written Integrity policy and need to sign the Help a Child Code of Conduct (annex 1). More specific information on the procedures related to Help a Child's recruitment procedure can be found in the Help a Child HR Policy<sup>6</sup>.

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<sup>6</sup> The HR Policy can be found on Sharepoint.

Should any concerns about someone's integrity arise during the probationary period, the issue should be discussed with the line manager together with the country Integrity Focal Point, Coordinator Integrity or the Confidential Counselor (annex 5). The line manager together with the CEO will decide what action to take. Furthermore, when a staff member resigns an interview will be held to know reasons of leave.

Besides reading the Integrity Policy and signing the code of conduct, all new employees follow a mandatory online course on integrity during the first month of their contract. Depending on the job position new employees will also follow a training in programming using Do No Harm principles. Furthermore, in order to refresh knowledge and skills on integrity and Help a Child's specific integrity procedures, every year each Help a Child office team will hold a '1-day Integrity workshop'. This workshop will be prepared and led by the integrity focal point. The workshop starts 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), consultants, trainees, interns and volunteers will also receive training on integrity - in support of the written Integrity Policy which has been shared with them. Furthermore, any person travelling on behalf of Help a Child - e.g. Supervisory Board members - and visiting a Help a Child country office, a partner organization, and/or a Help a Child project site will participate in a mandatory briefing in which the topic (child) protection is an important component.

As mentioned in the previous section, the Coordinator Integrity will build the capacity of the organization's Integrity Focal Persons. The coordinator will make sure the focal persons 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) information 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 protection issues. This is part of a required Organizational Standard Assessment. In addition, all partners of Help a Child have to adhere to the following minimum requirements with regard to 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 on integrity.
- All partner 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 Coordinator Integrity 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, and audit which takes place at least once every two years.

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

Besides awareness raising among employees, it is important to make the communities Help a Child works with aware of its Integrity Policy and related procedures, and to ensure they know their rights and responsibilities and know how to report concerns and/or complaints. Therefore, each new project with new project participants/communities will start with an induction-workshop on integrity. Help a Child country offices are expected to describe this 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, e.g. by using community dialogues and scenario-posters.

Even if the projects themselves are not focusing on protection, but solely on certain other sectors, such as foodaid, Help a Child aims to make "integrity" a cross-cutting theme in every project. Also, if possible, a local referral network is set up (e.g. health 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 mechanisms, 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 sport 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 Coordinator Integrity, or a person assigned by the Coordinator Integrity. Based on this analysis the Integrity Focal Point(s) involved, the Coordinator Integrity and the CEO will determine whether an investigation is justified.

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.

Help a Child also has a designated counselor, which can be contacted for advice. It offers the possibility to approach an independent person if faced problems concerning improper or unfair treatment and other integrity issues in the organization. The *Confidential Counselling procedure is described in annex 5.*