

Integrity Policy

1. Defining the concepts

Integrity is, more often than not, associated with the absence of corruption, fraud and other forms of unlawful conduct. While setting out an essential condition when hinting at integrity, the concept is however much broader than the aforementioned definition, as it also covers the way of dealing with complex ethical dilemmas.

Persons of integrity adhere to standards and values, even if those are compromised externally. They are honest, trustworthy and incorruptible and can be held accountable for their own behaviour and choices. The definition of integrity is largely dictated by society and is moreover a time-dependent notion.

Integrity at work implies that the standards and values in force within the organisation at the time, have been enshrined in a Code of Ethics and/or Code of Conduct.

It means that an integrity policy consists of the vast range of policy instruments aimed at promoting the integrity of the organisation as a whole but also of each individual staff member and party involved.

2. Objective of Light for the World's integrity policy

The integrity policy shall yield following outcome:

- gaining a deeper understanding of the vulnerabilities and risks involved in integrity breaches.
- Over time, cut back the risks and factors heightening those risks: ignorance and incompetence are reduced, as well as the situational temptations to engage in unethical conduct, while chances of being caught increase.
- Perpetrators are removed from the organisation and the work field. Potential perpetrators are being deterred.
- Victims are acknowledged.
- The organisation's accountability is being reinforced.

A successful integrity policy maps out and increases well-being at work. Setting up an integrity system reduces psychosocial risks at work, including violence, bullying and sexual harassment .

3. Rules and procedures

Light for the World's [Code of Ethics](#) lays the groundwork for the organisation's integrity policy and is intended for internal as well as external use.

Light for the World's values and standards are moreover translated into various formal internal procedures ruling the organisation and forming part of the organisation's Charter (F:\09. Procedures - ISO manual\09. Handboek LFTW). This covers inter alia the description of working processes, the

purchasing procedure, fundraising and risk management measures such as the so-called four eyes principle.

The Charter consolidates rules, procedures and policy instruments, shapes the organisation's functioning and contributes to enforcing integrity.

4. Enforcement

4.1. Roles and tasks within the integrity policy

In order to put into place an efficient integrity policy, the organisation has, to begin with, defined and demarcated different roles which are important in the system.

Formulating an integrity policy forms part of the mandate of the holder of the function 'Support Governance & Quality' within the organisation who is, in this capacity, the staff member responsible for integrity within Light for the World. Furthermore, there is the function of integrity counsellor involving confidential counselling. Light for the World being a small organisation, it has chosen to entrust the role of both the staff member responsible for integrity and the complaints manager to one and the same person.

The tasks associated with each important role involved are detailed below.

- The management of the organisation

The management is primarily responsible for the integrity policy and shall set an example in the promotion of integrity. Managers are more often than not viewed upon as the organisation's most important 'culture-bearers'. In the eyes of the staff, the management's behaviour is the standard. It is the task of the management to:

- highlight and demonstrate the importance they attach to integrity.
- Be proactive and raise or put on the agenda integrity-related issues or particular dilemmas.
- Put sufficient means at the disposal of the implementation and enhancement of the integrity policy.
- Allow the complaints manager to launch investigations.
- Take the final decision as far as penalizing the guilty party and promoting the victims' rehabilitation are concerned.

- Staff member responsible for integrity

The staff member responsible for integrity is in charge of coordinating and implementing the organisation's internal and external integrity policy. It, more specifically, concerns the following tasks:

- initiating the integrity policy, setting up, implementing, projecting and updating the policy plan and procedures.
- Developing, advising over and mobilizing the integrity tools, at the right moment (e.g. leaflets, presentations, training,...).
- Acquiring knowledge and expertise as far as integrity is concerned.
- Establishing a link between integrity and the organisation's core business, mission and primary processes.
- Make sure the commitments taken in the field of integrity are being honoured.

- Carrying out risk analyses on vulnerable processes and functions.
- Advising and reporting to the management.

- Integrity counsellor

The integrity counsellor is to be considered as the gateway to the reporting system. He/she offers primary support to the victims of or the witnesses to an integrity breach. All conversations with the integrity counsellor are strictly confidential.

Conversations with the integrity counsellor aim at:

- Giving the staff member concerned the possibility to tell his/her story.
- Ascertaining whether the reported fact is pertaining to a labour dispute, a moral protest or moral doubt, a psychosocial risk or a breach of integrity.
- Examining, together with the staff member, which possible and adequate proceeding steps could be undertaken, taking into account the former's best interests.
- Help the staff member concerned to make a decision. He/she is free to refrain from any proceeding steps.
- If relevant, referring the staff member concerned to:
 - the system set up for reporting breaches of integrity.
 - HR for labour disputes.
 - The staff member responsible for integrity for cases implying protests and doubts; (Light for the World' ethical jurisprudence).
 - The external prevention service (Idewe) for psychological help.

The integrity counsellor is not the point of contact within the integrity system but he/she will however offer guidance to the person who would like to file a complaint.

- Complaints manager

The complaints manager is the body receiving the reports about (suspected) breaches, be it directly or indirectly. After a preliminary investigation, he/she decides whether or not a formal investigation is required and submits a proposal for investigation to the management. The complaints manager carries out the investigation as such, unless it deals with a complex issue requiring the intervention of an external party. The complaints manager forms part of the sanctioning procedure. Concrete commitments and responsibilities are:

- performing the preliminary investigation of the reported facts.
- Submitting the proposal for investigation to the management if a formal investigation is deemed necessary. The aforesaid proposal contains the conclusions of the preliminary investigation, the formulation of the investigation assignment and the areas to be investigated, a proposal for an internal or external investigation, as well as the required budget if need be.
- Preparing the report containing the conclusions of the investigation and the preventive lessons that can be drawn from the case.

4.2. Prevention

In the first place, the organisation intends to focus on preventive measures in order to avoid any breach of the ethical code. Breaches are not always intentional. Ignorance and incompetence play a part, as well as succumbing to situational temptations. It does not imply that the breach or damage is

less severe. It does however provide an interesting approach for the purpose of prevention. Light for the World commits to engage in a preventive approach through:

- Making the Code of Ethics and integrity policy known and opening them up for discussion
The organisation has provided for a general framework which already removes part of the lack of knowledge. All members of the organisation's staff are familiar with the Code of Ethics and the integrity policy. By signing the Code, they committed themselves to comply with its provisions.
- Integrity training
Training sessions can target specific integrity instruments, e.g. the role of the integrity counsellor, global training sessions about integrity as a whole. Dilemma training sessions can also be organized for the team. The aim not only consists in building expertise but also in raising the team's awareness of the importance of integrity. Training sessions and/or awareness-raising at the level of the global organisation take place once a year.
- Sanctions
Implementing a sanctions policy increases the chances of the perpetrator being caught meaning, in turn, a heightened risk of being penalized, which has an undeniable deterring effect.
- Risk analysis
In collaboration with the heads of department, breach-prone processes and functions are being exposed. A risk analysis is performed each year on this basis. By means of interviews, observations and file reviews, the main goal is to offer a full picture of what is actually happening in the workplace, of the related direct risks of integrity breaches and of possible other general risk-enhancing factors. This analysis provides an input to the formulation of recommendations and the organisation of controls, training, etc.

4.3. Sanctions

The Code of Ethics is the bedrock of a responsible ethical conduct and is binding upon all staff members, consultants, volunteers, ... and any other party tasked by Light for the World.

Each party concerned is expected to report any breach of integrity they have witnessed or have been made aware of. The reporting procedure is an integral part of this policy paper.

As put forward in the Code of Ethics, breaches have consequences, depending on the seriousness of the facts reported. They can result in a warning but other penalties may be imposed, up to the termination of the contract.

5. Procedures

Following procedures form an integral part of this policy paper:

- procedure for reporting a (suspected) breach of integrity.
 - Procedure ruling the reception and processing of a report about a (suspected) breach of integrity.
 - Procedure organising uniform reporting of (suspected) breaches of integrity to the staff member responsible for integrity/the management.
 - Procedure ruling the organisation of a risk analysis.
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