

THE LILIANE FOUNDATION AND MIVA's INTEGRITY POLICY



Status:	Final
Date:	1 November 2022
Agreed by:	
Version:	1.1
Next revision:	2023

The Liliane Foundation and MIVA's Integrity Policy

Introduction

Trust and connection form the basis of our approach and this requires openness. The Integrity Policy of the Liliane Foundation and MIVA Foundation (hereinafter: the Liliane Foundation and MIVA) provides a coherent framework, which describes the conduct the Liliane Foundation and MIVA expects from their employees, ambassadors and others working for or on behalf of the Liliane Foundation and/or MIVA. By employees, we mean both employed and volunteer staff. 'Others' working for or on behalf of the Liliane Foundation and/or MIVA include self-employed staff and consultants.

This Integrity Policy describes how we promote the correct conduct, the procedures we have in place to enforce the correct conduct and where you can submit a report or complaint. In this document you will find an overview of all the procedures, which are also attached to the Integrity Policy as appendixes. Some of the procedures apply to SPOs/POs, and this is specified in the procedures concerned.

The integrity policy consists of the following sections:



Prevention

We strive for proper conduct and integrity as soon as we consider entering into a new partnership. We take the following measures in order to obtain adequate assurance regarding the conduct and integrity of a potential new employee, consultant or self-employed person when we start working with them:

- For every employee entering our paid employment (including temporary employees such as self-employed persons), before the meeting to discuss the terms of employment, the manager will carry out a reference/integrity check with two references: with his/her/their current and previous employer, or two previous, separate clients.
- The candidate is asked to agree to this check.

- Anyone entering into an employment or cooperation contract for a definite or indefinite period of time with the Liliane Foundation and/or MIVA must submit a Certificate of Good Conduct (VOG). The Liliane Foundation/MIVA will reimburse the costs involved. The requirement of a VOG also applies to self-employed persons, volunteers, consultants, ambassadors and external parties who travel on behalf of the Liliane Foundation and/or MIVA. Once in our employment, employees must renew the VOG certificate after four years. Self-employed persons and/or consultants are required to renew a VOG certificate after two years.
- During the meeting to discuss the terms of employment, HR discusses the content of the Code of Conduct. 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 declares to commit 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, at which integrity is discussed in more detail.
- Annual, mandatory awareness sessions are organised on the subject of integrity for staff and volunteers and there is moral deliberation on a regular basis.

1. Code of Conduct (Appendix 1)

The Code of Conduct is a document that every employee and others working for or on behalf of the Liliane Foundation and/or MIVA personally sign. It forms the frame of reference for what we consider to be proper conduct. The Code of Conduct does not contain an exhaustive list of specific rules of conduct, but is primarily a document outlining values with the aim of each employee assuming responsibility for his/her actions. Part of the Code of Conduct also includes provisions on Child Safeguarding (Appendix 2).

2. Child Safeguarding Policy (Appendix 2)

The Liliane Foundation and its partner organisations have a Child Safeguarding Policy. The Liliane Foundation/MIVA and their partners consider the interests and protection of children with a disability to be paramount. Children with a disability are particularly vulnerable to abuse, mistreatment and violence due to their physical or intellectual impairment. When working with children and their parents/carers and guardians, the Liliane Foundation/MIVA and their partners have a special responsibility to ensure a safe environment in which children are not at risk of abuse, mistreatment or violence and in which their rights are respected. This policy describes the responsibility this involves, our approach to it and what we do in case of (suspected) transgressive behaviour towards children.

3. Submitting a report

If you suspect a case of improper conduct, you can discuss it with your supervisor or report it to the following people:

Confidential Counsellor (internal and external)

The Liliane Foundation and MIVA have an internal confidential counsellor (Hanne Aikema) and an external confidential counsellor, Miriam Smit. The role of the internal and external confidential counsellors involves dealing with cases of experienced or reported improper conduct. By improper conduct we mean any form of conduct that violates the law and the values of the Liliane Foundation and MIVA, in particular sexual harassment or sexual abuse, discrimination, aggression, bullying and fraud.

Labour law issues are not part of the responsibilities of the internal confidential counsellor - employees can discuss these matters with their supervisor or HR adviser.

Point of contact for submitting a report and Integrity Committee

The Integrity Officer is the point of contact for submitting a report about any form of improper conduct (e-mail integrityofficer@lilianefonds.nl or integrityofficer@miva.nl) or, a report about child safeguarding, the child safeguarding focal point (e-mail childsafeguarding@lilianefonds.nl). This offers the advantage that it is clear to people where they should submit a report - thus promoting accessible reporting.

Complaints from the Dutch public or donors are reported to donor management (e-mail voorlichting@lilianefonds.nl or info@miva.nl). This is also stated in the general complaints procedure posted on the websites.

For (alleged) malpractice and in situations in which the person who submitted the report is dissatisfied with the internal process, an external report can also be submitted in accordance with the Whistleblower Regulation (Appendix 6). 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.

After a report is received by the Integrity Officer or the Child Safeguarding Focal Point, there is an Integrity Committee (**Appendix 3**) that assesses reports of situations in which employees, self-employed staff, consultants, SPO/PO staff observe and/or experience improper conduct.

The Integrity Committee consists of four members:

- An independent external chair,
- One member appointed by the Works Council,
- One member appointed by the Director,
- The Integrity Officer.

If the report concerns improper conduct involving children, the Child Safeguarding Focal Point is also part of the Integrity Committee. The Integrity Committee's approach is detailed in the Complaints Procedure for Improper Conduct (Appendix 4).

4. Enforcement: Procedures in the event of non-compliance with the Code of Conduct or Child Safeguarding Policy (Appendices 4, 5 & 6)

The Liliane Foundation and MIVA have a Complaints Procedure for Improper Conduct, an Anti-Fraud Protocol, and a Whistleblower Regulation by which (suspected) improper conduct, fraud and malpractice can be reported and dealt with. Each type of report 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 with the aim of minimising any opportunity for fraud to occur. These processes are beyond the scope of this policy.

5. Other complaints and procedures

Labour law issues or internal complaints about policies

We have not drawn up separate regulations for labour law issues or complaints from employees about the Liliane Foundation and/or MIVA's policies.

- You can report labour law issues to your supervisor and/or the HR adviser. If the labour law issue has not been handled satisfactorily, you can report it to the Director.
- In the case of a reorganisation, the social plan describes where and how you can file an objection.

- Employees can submit complaints about the Liliane Foundation/MIVA's policies to their supervisor, and complaints of a general nature can be reported to the 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 Foundation and MIVA have established a general complaints procedure. This procedure is for general complaints or dissatisfaction by external parties about the Liliane Foundation or MIVA regarding a service or product provided by the Liliane Foundation or MIVA. The procedure and approach can be found in the General Complaints Regulation on the website (**Appendix 7**).

6. Procedures for SPOs/POs

The Integrity Officer is also the point of contact for employees of SPOs/POs to report integrity issues (e-mail integrityofficer@lilianefonds.nl or integrityofficer@miva.nl, in the case of improper conduct towards children, this is the Child Safeguarding Focal Point (e-mail childsafeguarding@lilianefonds.nl).

Suspected cases of fraud, harassment and improper conduct can be reported and dealt with through the Anti-Fraud Protocol, the Complaints Procedure for Improper Conduct and the Child Safeguarding Policy.

For general complaints about the policies of the Liliane Foundation and/or MIVA, and for reporting and dealing with malpractice (from countries outside the EU), the 'Complaints and Whistleblower Regulation for SPOs' applies (**Appendix 8**). 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 Counsellors, the Integrity Officer (also on behalf of the Integrity Committee) and the Child Safeguarding Focal Point report on an annual basis to the Director on the main qualitative and quantitative aspects of the cases dealt with. The Director shares the report with the Works Council and with the Supervisory Board. In addition, the number of reports, the nature of the reports and the way they were handled are published on our website and in our Annual Report. Based on the report, each year, the Director determines how the theme of integrity needs to be addressed in the organisation.

Internal Confidential Counsellor: Hanne Aikema, haikema@lilianefonds.nl

External Confidential Counsellor: Miriam Smit, 06 – 21 39 74 42 info@humanresults.nl

Integrity Officer (point of contact for submitting a report): Quality Officer, integrityofficer@lilianefonds.nl or integrityofficer@miva.nl

Child Safeguarding focal point (point of contact) childsafeguarding@lilianefonds.nl