



Dorcas

Integrity

Framework

Document information

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1. Integrity

Our integrity is derived from and embedded in the mission and values of Dorcas Aid International, as formulated in the strategic annual plan.

Dorcas is a Christian organisation with biblical values. In our work, we see a world where poverty, exclusion and crisis marginalise people. We also see the potential of these people and their communities to flourish despite their difficult circumstances.

We believe in the value and God-given potential of every single person. We are called to demonstrate God's love for those in need. This is how we follow Jesus Christ.

We are guided by the following values:

- **Accountable:** We do what we say, work transparently and use resources wisely.
- **Compassionate:** We see those in need and stand next to them.
- **Determined:** We have an entrepreneurial spirit and do not give up.
- **Locally led:** We work through local leadership, staff and partners

1.1. Purpose and scope

Dorcas sets high standards for integrity and strives for an open and transparent culture. We continuously work together to improve our programs in order to reach those who are in need. This Integrity Framework and its annexes are an important fundament for how we manage integrity.

Together we strive for continuous awareness among all representatives of Dorcas (including employees, consultants, trainees, interns and volunteers) to feel personally and collectively responsible for upholding and promoting standards of ethical and professional conduct. This Integrity Framework, including its annexes, aims to provide clear guidance on what we expect of each other. It describes high standards of behaviour and promotes good practice for everyone representing Dorcas Aid International. This Integrity Framework, including its annexes, applies throughout the organisation, including the countries where we work as well as the Dorcas shops.

1.2. Meaning of integrity

Dorcas believes that it is important for everyone to reach out to act Christlike and with integrity: meaning to act with love and kindness, being reliable and patient, with goodness and self-control. To do no harm and carefully consider the rights and interests of others. To treat people equally in many ways, nobody should feel excluded. Working with Dorcas 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.

Acting Christlike and with integrity is a joint responsibility. Both for employees (and other representatives) and for Dorcas as an employer. This integrity framework is an essential part of its duty of care. Dorcas aims to protect its employees against integrity risks by putting in place the right facilities and actively promoting a culture of integrity within the organisation.

1.3. Integrity team

Dorcas has several offices. In the Netherlands, the International Office (IO) is located and there are several country offices (CO) in Africa, the Middle East and Eastern Europe. The Integrity team consists of:

1. Integrity Officer

In its International Office in the Netherlands, Dorcas assigned an Integrity Officer. The Integrity Officer exercises an independent, advisory and monitoring role. Directors and managers remain primarily responsible for integrity within their own country offices, departments, shops or teams (see Table 1). This separation of responsibilities ensures that integrity is sufficiently guarded with proper checks and balances in place, while equipping managers and Country Directors to lead effectively on this important topic. A role description for the Integrity Officer is available.

2. Country Integrity Focal Points (IFP)

In each Dorcas Country Office a person is appointed to fulfil the role of Integrity Focal Point (IFP), who functions as a supporting role to both the Country Director and the Integrity Officer.¹ A role description for the IFP is available.

3. Regional Integrity Focal Points (RIFP) (optional)

Regional Integrity Focal Points can be appointed to take over some of the responsibilities of the Integrity Officer for a particular region. The role description for the RIFP outlines this in more detail.

Table 1: Division of integrity responsibilities

Level	First line - Primary responsibility for integrity	Second line - Expertise and supervision
International Office	Director / Manager	Integrity Officer / Regional integrity Focal Point
Country Office	Country Director	
Shop	Shop steering group	

1.4. Reporting and monitoring

Each year, Dorcas provides a brief reflection on integrity, including steps taken in the context of the Integrity Framework and the integrity culture measurement, as well as a summary report on integrity violations. This is included in the annual report. The Feedback & Complaints Mechanism includes periodic reporting requirements for complaints.

The Integrity Officer provides an annual integrity update to the IMT. This update takes a strategic focus on integrity, meaning that emerging trends and developments in the area of integrity are presented and discussed. This is done pulling data from the feedback & complaints mechanism, integrity risk assessment, integrity culture assessment, as well as changes in the external environment. Where necessary, this can lead to changes to the integrity framework.

¹ Responsibilities with regard to handling feedback and complaints are outlined in the Feedback and Complaint Mechanism (see Section 4.3).

1.5. External requirements

At Dorcas, the intrinsic motivation to do the work with integrity is high. We nevertheless believe in the value of external supervision. This framework and its annexes are part of Dorcas' efforts to ensure compliance with the following external requirements:

- a. Core Humanitarian Standard on Quality and Accountability (2014)
- b. IASC Task Force on PSEA, Guidelines on PSEA Minimum Standards (2013)
- c. Partos 9001:2015, Section 7.1.4 (version 2018)
- d. UN Convention on the Rights of the Child (1989)
- e. Principles of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Response Programmes (1995)
- f. Secretary-General's Bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse (2003)

1.6. Prevention of sexual exploitation and abuse

The prevention of sexual exploitation and abuse (PSEA) is considered as falling within the scope of this Integrity Framework. In a few instances, explicit commitments are made with regard to PSEA in this framework as it deserves priority as one of the key integrity risks that the sector faces. Furthermore, behavioural expectations regarding PSEA are found in the Code of Conduct and the Child Safeguarding Protocol.²

1.7. Project partner organisations and other third parties

Dorcas works closely with various partner organisations in the implementation of our programs. We expect all our partners to know and subscribe to our Integrity Framework and policies. By signing the Project Partner Agreement, partner organisations confirm that their staff and volunteers have signed the Dorcas Code of Conduct. In addition, we expect our partner organisations to have their own policies on integrity and PSEA or partners can refer to the Integrity Framework and policies of Dorcas. This is periodically evaluated as part of the partner assessments. Where necessary, partner organisations are trained to ensure adequate knowledge and awareness of the standards of conduct and Integrity Framework of Dorcas.

General contract conditions of Dorcas contain a mandatory clause on the Code of Conduct as well as on PSEA.³

² As a result of this approach, Dorcas no longer has a separate PSEA Policy as of 2023.

³ Full text of the PSEA clause: "Dorcas Contractors warrant that they shall: (a) Take all appropriate measures to prohibit and prevent actual, attempted and threatened sexual exploitation and abuse (SEA) by its employees or any other persons engaged and controlled by it to perform activities under this Agreement ("other personnel"). For the purpose of this Agreement, SEA shall include: 1. Exchanging any money, goods, services, preferential treatment, job opportunities or other advantages for sexual favours or activities, including humiliating or degrading treatment of a sexual nature; abusing a position of vulnerability, differential power or trust for sexual purposes; and physical intrusion of a sexual nature whether by force or under unequal or coercive conditions. 2. Engaging in sexual activity with a person under the age of 18 ("child"), except if the child is legally married to the concerned employee or other personnel and is over the age of majority or consent both in the child's country of citizenship and in the country of citizenship of the concerned employee or other personnel.

1.8. Reading guide

This Integrity Framework begins with an outline of the various Dorcas policies related to integrity (Chapter 2). After this, the themes of integrity prevention (Chapter 3) and detection & response (Chapter 4) make up the remainder of the framework. Those chapters contain concrete efforts that are helping us to *prevent* integrity issues from happening, to *detect* them when they do occur, and to *respond* to them adequately.

(b) Strongly discourage its employees or other personnel from having sexual relationships with Dorcas beneficiaries. (c) Report timely to Dorcas any allegations or suspicions of SEA, and investigate and take appropriate corrective measures, including imposing disciplinary measures on the person who has committed SEA. (d) Ensure that the SEA provisions are included in all subcontracts. (e) Adhere to the above commitments at all times. Failure to comply with clauses (a) to (d) shall constitute grounds for immediate termination of this Agreement.”

2. Policies

2.1. Code of Conduct

The Dorcas Code of Conduct sets the norms for conduct across the organisation. When such norms are formulated and communicated clearly, employees and other representatives know what is expected of them. Representatives of Dorcas should always behave in a manner that represents Dorcas' mission and beliefs and core values. All representatives (employees, consultants, volunteers, trainees and interns) of Dorcas are expected to sign the Code of Conduct before conducting any activities on behalf of Dorcas. By signing it, they also agree to adhere to the entire Integrity Framework and its annexes. Furthermore, persons who visit Dorcas employees, partner employees and/or programs are obliged to read, sign and adhere to a Code of Conduct before travel.

2.2. Child safeguarding

The safeguarding of children is an essential prerequisite for the work of Dorcas. Dorcas has adopted a Child Safeguarding Protocol that aims to ensure that the children we work with are protected (see Annex II).

2.3. Feedback, complaints and reporting

Refer to the final sections of Chapter 4 for more information regarding the Feedback and Complaint Policy, Whistleblower Policy, and Disciplinary Guidelines & Procedure.

2.4. Financial integrity

Dorcas expects from all persons working on behalf of Dorcas to uphold the financial integrity of our organisation. This means that people are transparent about how the money is used to carry out our mission. Dorcas aims to prevent and act upon financial misconduct. All agreements regarding Dorcas financial integrity are laid down in the Dorcas Financial Manual.

3. Prevention

3.1. Recruitment

Prevention begins with recruiting good and reliable employees. Employees who believe in our mission and want to contribute to it. And who can commit to, among other things, the Dorcas Code of Conduct. We use different tools (checking criminal record and at least two references) to assess their integrity to ensure as much as possible that we hire people with a high standard of integrity. For all Dorcas staff a criminal record and reference check is part of the application procedure, if possible. All Dorcas job applicants are informed via the job vacancy about our Code of Conduct. Candidates are interviewed multiple times by multiple persons. These job interviews cover questions about integrity and PSEA.

3.2. Training

All employees receive integrity training when they start working at Dorcas, which includes the code of conduct, the way to report feedback and complaints, as well as the implications of breaching standards of conduct. This is combined with a half-day training on PSEA for local staff working in high-risk areas. Staff also receive periodic refresher training.

Based on the integrity culture survey, additional training may be organised to address (local) vulnerabilities with regard to knowledge and awareness. For instance, training should also consider aspects of moral judgment and the importance of discussing dilemmas.

Directors and managers, as well as integrity-related personnel, are provided with systematised training (including on PSEA) that is commensurate with their relevant responsibilities.

3.3. Other communication

Dorcas uses centralised means of communication to inform employees, volunteers, partners as well as program participants on a regular basis on the Code of Conduct, PSEA, and how to share feedback or complaints. For instance, by means of posters, stickers, and information on the intranet. Standardised materials are available in particular for the purpose of generating project participant awareness.

3.4. Integrity culture measurement

Through a bi-yearly survey, Dorcas monitors the integrity culture across its organisation. The aim of this measurement is to gain insight into the current perceptions of employees and volunteers when it comes to integrity in their daily work. Based on this, proactive follow-up actions are taken to further improve the integrity culture. The measurement is done using the soft controls model developed by prof. M. Kaptein, which include the following eight integrity dimensions: clarity, leadership by example, involvement, achievability, transparency, openness to discuss dilemmas, accountability, and enforcement. The measurement also allows Dorcas to evaluate the effectiveness of awareness raising efforts around the code of conduct, feedback and complaints, and PSEA.

3.5. Integrity risk assessment

Through a periodic integrity risk assessment, Dorcas can proactively identify and mitigate integrity risks across the organisation. Through interviews, observation and scrutiny of relevant

documentation, vulnerabilities are identified and subsequently mitigated by means of adequate follow-up actions. The integrity risk assessment does not consider aspects of integrity culture (so called 'soft controls'), as those are assessed by means of the integrity culture survey measurement (see Section 1.4). Rather, its focus is on risks that require the introduction or improvement of hard controls such as policies, procedures and other instruments.

Furthermore, the Dorcas Project Implementation Manual includes guidelines on identifying and mitigating PSEA-related risks in programs to make them safer for participants.

4. Detection & response

4.1. Performance appraisal

Integrity is a performance metric for Dorcas. Conversations regarding performance should therefore always involve a sufficient consideration of integrity. This is especially important when evaluating the performance of people in (senior) leadership of Dorcas and its country offices, who have the responsibility to build and maintain a culture of integrity which prevents misconduct (in particular, sexual exploitation and abuse). Involving integrity in performance appraisal allows us to keep each other to account when it comes to how we do our work. It also helps to detect potential integrity issues at an early stage.

4.2. Confidential counselling

Dorcas assigned a Confidential Counsellor to support people experiencing or witnessing misconduct by Dorcas representatives and/or in our programs. Conversations between the Confidential Counsellor and the person asking for advice are strictly confidential. The support includes: listening; support in the clarification of the type of misconduct experienced; advice on possible steps to be taken; support in making a decision related to this.

4.3. Feedback and complaints

Dorcas aims to create an environment which is open to feedback and complaints. Such an environment is crucial to make employees, volunteers, partners, communities and project participants feel comfortable to speak out to us. Our feedback and complaint mechanisms are aimed at creating ways to invite anyone to do so. More information about reporting and handling complaints you can find in our Feedback and Complaint Mechanism (see Annex III). You can also find all our reporting channels and an example reporting form (see Annex VI).

Feedback and complaints can relate to the work we do or to the behaviour of our representatives. The Feedback & Complaint Mechanism is designed to ensure that the way in which a complaint is investigated and potentially is commensurate with the gravity of the complaint.

It is important to make the Dorcas communities and project participants feel comfortable and know how to share feedback and complaints. Therefore, establishing effective mechanisms and creating awareness their existence is important and necessary. The Mechanism includes several guidelines for our country offices on how they should establish such mechanisms and subsequently inform communities and project participants.

4.4. Whistleblower Policy

To report suspicions of malpractice or irregularity within Dorcas, it is possible resort to the Whistleblower Policy. This procedure ensures that such suspicions can be reported without fear of retaliation. More detail can be found in the Whistleblower Policy (see Annex IV).

4.5. Disciplinary Guidelines and Procedure

If an employee, volunteer or other representative of Dorcas acts in a way that is inconsistent with our integrity standards, values and principles and does not adhere to our rules of conduct and does not commit to our integrity framework, it can be necessary to take disciplinary measures.

We have summarised guidelines for taking possible measures regarding any form of misconduct. These can be found in our Disciplinary Guidelines and Procedure (see Annex V) and are intended to provide guiding and principles about how Dorcas will handle and act when employees violate our Code of Conduct.

Annexes

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