

INTERNAL INTEGRITY MANAGEMENT POLICY

Viva Salud is a signatory of the NGO Integrity Charter launched in 2018 by the Minister for Development Cooperation, Alexander De Croo. By signing this charter, Viva Salud pledges to **inform, train and raise the awareness of its staff on integrity**, to **have an integrity advisor anyone can turn to for advice**, to **have a mechanism for reporting complaints**, as well as a **procedure for handling complaints**... It has also developed a code of ethics promoting the integrity of all people closely or remotely linked to Viva Salud's activities (staff, members of the Governing Body and General Assembly, volunteers, partners, ...).

1. Roles

Viva Salud's **quality coordinator** acts both as **integrity manager and advisor**. He/she can be contacted via advice.integrity@vivasalud.be.

As integrity manager, he/she ensures that the ethical code and the integrity charter are known to all, respected and actively used, and that procedures are applied to develop a culture of integrity within Viva Salud. He/she raises awareness and informs the various stakeholders (internal and external). This is a more preventive role.

As integrity advisor, he/she also assists people considering filing an (integrity) complaint and advises them on all aspects of the process. With the help of the complaints manager, he/she monitors and reports on integrity incidents. He/she monitors and evaluates the complaint prevention and handling systems on an annual basis and participates in external meetings with federations.

The **complaints manager** can be contacted via safeguarding@vivasalud.be. The complaints manager receives complaints and ensures appropriate follow-up as indicated in the procedure.

The **Complaints Committee** is made up of the complaints manager, an OA member, the finance manager and the executive committee. When an investigation has to be carried out, one or two (depending on the seriousness of the integrity breach) of its members are designated (deemed to be the most qualified according to the nature of the complaint) to assist the complaints manager. If the person accused is a member of the committee, he or she is automatically excluded from the designated members. The committee, thus constituted, is solely responsible for deciding on the measures and sanctions to be taken.

The steps involved in handling complaints are explained in more detail below. The complaints manager must :

- receive and acknowledge receipt of alerts sent to safeguarding@vivasalud.be, by sending an acknowledgement message to the whistleblower as soon as possible and within a maximum of 4 days (96 hours) after receipt of the e-mail
- verify the completeness and validity of the complaint (sufficient and credible information) and anonymize all documents
- review and assess the type and nature of the complaint and recommend the most appropriate course of action
- identify qualified external experts to investigate sensitive and complex complaints
- if necessary, coordinate and facilitate the investigation with the help of one or two members of the Complaints Committee
- compile all information: exchanges, documents, investigation reports, etc. relating to the case in question in a dedicated, secure file
- keep whistleblowers informed of the main stages in the processing of their request (follow-up by e-mail)
- communicate the final decision as soon as possible by post or e-mail to the person(s) who raised the alert, to those involved in the investigation or procedure and to the line manager
- guarantee confidentiality throughout the process
- assist the integrity advisor in drafting the annual complaints report

2. Alert procedure for reporting integrity breaches

Viva Salud has set up a **confidential hotline** for reporting complaints: safeguarding@vivasalud.be . Anyone can report any incident or suspicion of a breach of integrity, anonymously or not.

2.1 Who can report an integrity breach ?

Any person (employee, volunteer, beneficiary or any other external stakeholder) who has witnessed or been subjected to behaviour that violates integrity in the context of an activity related to Viva Salud's work may report the facts or lodge a complaint.

They may be aimed at persons within Viva Salud who are bound by a contract (employee, volunteer, etc.). They may also be aimed at people outside the organization but linked to Viva Salud's activities (partners, suppliers, subcontractors, local communities, etc.).

2.2 Which type of acts or behaviour must be reported ?

The reporting system facilitates reporting incidents, acts, behavior or suspicions that could undermine the integrity of individuals or the organization itself, and that do not comply with our ethical code or the signed NGO Integrity Charter.

Integrity includes both aspects related to **financial integrity** (corruption, fraud, etc.) and aspects related to **moral integrity** (abuse of power, discrimination, sexual misconduct, abuse and exploitation, etc.). Here is a non-exhaustive list:

Financial integrity :

- Inappropriate gifts or activities (received or offered)

- Corruption, theft, fraud, bribery
- Intentional errors in invoices, expenses and costs

Moral integrity :

- Acts of discrimination
- Abuse of power, harassment and intimidation
- Inappropriate behavior (sexual harassment, etc.)
- Sexual or economic exploitation
- Acts of favoritism or injustice
- Use of force and threats

2.3 Reporting an incident

To submit a report, whistleblowers should send an e-mail to safeguarding@vivasalud.be .

The content of the alert must include facts, places, dates, any information or other useful documents, whatever their form or medium, as well as contact details.

By way of example, here is the relevant information to best compile the file:

- Identity and contact details of the whistleblower (where possible)
- Description of the case, including all known relevant facts (what happened, where, what specific behavior gave rise to this complaint, who was involved, etc.).
- Explanation of the reasons for the complaint or presentation of the facts
- Have the facts already occurred or could they occur in the future?
- Information on how the whistleblower became aware of the violation or situation
- Information about other people involved or witnesses
- Additional information or evidence provided by the whistle-blower (e.g. documents, e-mails, etc.)
- Prior discussion between the whistle-blower and other persons (if applicable, with whom)

It is not necessary to add other recipients to the e-mail. The procedure ensures the relevant or competent persons are informed as appropriate.

Any abusive or inappropriate use of the reporting system may result in prosecution.

2.4 Confidential or anonymous handling

The whistleblower's name is protected and the whistleblowing procedure is completely confidential. It can only be consulted by a third party in the following cases:

- If the whistleblower explicitly agrees to the disclosure of his or her identity.
- If the whistleblower has reported in bad faith
- If required by law¹

Viva Salud accepts anonymous reports. In this case, either the whistleblower gives his or her name but asks to remain anonymous. Viva Salud will then respect their anonymity. Or, the whistleblower wishes to remain anonymous to everyone. In this case, we invite the whistle-blower to use an e-mail address that does not reveal his or

¹ As a citizen, you are legally obliged to come forward as a witness to current or future offences against other citizens (e.g., an assault in the street), property (e.g., theft) or public safety (e.g., an attack).

her identity. We nevertheless ask that this e-mail address remain active for the duration of the procedure, so that we can contact the whistle-blower again and deal with his or her report correctly.

2.5 Protection of the whistleblower, the victim and the person accused

It is essential that everyone feels free to use the whistleblowing process without restriction or fear of reprisal. Viva Salud is committed to **protecting the whistleblower**, firstly by not disclosing his/her identity unless the whistleblower allows it. It also ensures that the whistle-blower is protected against possible reprisals. This includes all types of harm: loss of status or benefits, harassment, or any threat involving restrictive measures.

Viva Salud is also committed to **protecting victims**. This support can be provided in a variety of ways (legal, psychological, medical, etc.).

Finally, Viva Salud is committed to finding the best possible balance between the interests and rights of the various parties involved, including the person accused.

The rights applicable to the accused include :

- Protection of personal data
- Presumption of innocence until the conclusion of the investigation
- Rights of defense

2.6 Protection of personal data

Viva Salud aims to comply with the « General Data Protection Regulation » approved by the European Parliament (RGPD 2016/679) and all applicable laws. Personal data may not be kept longer than the time required for processing.

3. Complaint handling process

The only person with access to the safeguarding@vivasalud.be mailbox is the complaints manager. Should this person fall ill or be absent for any other reason, a designated member of the Complaints Committee will replace him or her for the duration of the absence.

He/she consults the safeguarding@vivasalud.be mailbox every working day.

Throughout the process, the complaints manager is responsible for two aspects:

- the confidentiality of the whistle-blower as well as that of the accused must be guaranteed throughout the complaint handling process.
- feedback to those involved. It is important to communicate and maintain the trust of stakeholders, otherwise the mechanism for receiving complaints will cease.

3.1 Receipt and admissibility of complaints

When a complaint is received, the complaints manager acknowledges its receipt by sending an acknowledgment message to the whistle-blower as soon as possible and within a maximum of 4 days (96 hours) of receipt of the e-mail.

Complaints will be registered in an internal Viva Salud system to which staff access will be restricted, and where their registration upon receipt, the follow-up of actions and the recording of results will be confirmed.

The complaints manager **compiles all the information concerning the complaint:** e-mail exchanges, information about the case in question, etc. He/she then checks the admissibility of the complaint. Here are some important elements that make a complaint inadmissible:

- Complaints or reports relating to activities, events or persons for which Viva Salud is not responsible
- Complaints not related to integrity violations
- General complaints that are not described in detail
- Complaints concerning events that occurred more than five years ago
- Complaints (from the same whistleblower) that have already been processed or are in the process of being processed.

If a complaint is judged to be inadmissible for lack of information, the complaint manager may request further information from the whistleblower.

If a complaint is deemed inadmissible for any other reason, the process stops and the complaint manager informs the whistleblower that the complaint has been received and is inadmissible.

3.2 Mediation and investigation

When a complaint is **admissible**, the complaints manager deals with it on a case-by-case basis, and ensures appropriate responses in line with the organization's values, missions and procedures/policies. The seriousness of the complaint will determine the course of the investigation.

When all stakeholders have been informed and no investigation is required, but no solution has been found, the complaints manager, assisted by Viva Salud's management committee, acts as **mediator** to find, through dialogue and mediation, a solution that is fairest to all stakeholders.

Preliminary measures may need to be taken immediately (i.e. before the investigation is launched), to protect the whistleblower, witnesses and/or any person who may be in a situation of danger or weakness. In this case, for example, the suspect's employment contract could be suspended during the investigation.

When an investigation is to be carried out, one or two members of the Complaints Committee, made up of the complaints manager, members of the Board of Directors, the finance manager and the executive committee, are called in.

The designated members of the Complaints Committee reserve the right, depending on the seriousness of the situation and the context, to **call in an external**

investigator if the situation exceeds the usual capacity for intervention (serious cases of integrity violations, need for specific expertise, etc.).

In other cases, they take care throughout the investigation process to:

- maintain confidentiality wherever possible
- conduct a fair and adequate investigation
- gather all the facts without judgment or bias
- be aware of possible reprisals
- to bear in mind that any person accused of abusive behaviour is presumed innocent until the investigation has ruled on his or her guilt

To carry out the investigation, the complaints manager should be assisted by one or two additional members of the Complaints Committee who are recognized as being the most qualified, depending on the nature of the complaint. It is also advisable to conduct the investigation in close collaboration with a legal advisor to determine the communication, information gathering, interviews and documentation for each investigation. Here are some important steps to take during the investigation:

- Determine the type of integrity violation, particularly financial or moral
- Identify all parties involved in the alert: the whistle-blower, the victim and the accused person.
- Determine the sensitivity, risk and complexity of the alert. When a high-level body is the subject of the complaint, the sensitivity of the investigation increases. The international nature of a complaint increases the complexity of the investigation, and reporting by an employee increases the risk of retaliation.
- Determine whether the violation is an isolated event or a potentially recurring one. For example, a person who has incorrectly declared an expense or who does so on a recurring basis.
- Identify and consult all parties necessary to conduct the investigation
- Analyze evidence to better understand what is going on. Evidence may be available on paper or in electronic form, such as e-mails, internal or official documents, cell phone messages, testimonies, etc. It may be provided by the whistleblower, other people involved or other parties consulted.
- Conduct interviews with the people concerned. The investigation will determine who is to be interviewed and how the interview will be conducted. Interviews may be conducted provided that no pressure is exerted on the person or that there is no intimidation. The interviewee has the right to refuse the interview. When recording the interview, the interviewee's prior consent must also be obtained. Interviews must be documented with detailed notes by the investigating team. At the end of the interview, the notes should be presented to the interviewee so that he or she can add to or correct the information contained in the notes. This document acts as a "declaration", which the interviewee is required to sign. During an interview, it is important to :
 - describe the context and purpose of the interview

- ask open-ended questions
 - be objective, empathetic and patient
 - refrain from promising particular results or drawing conclusions
 - temporarily suspend the interview if the interviewee becomes angry or overly emotional
 - ask for any supporting documentation
 - recommend that information shared remain confidential to third parties
 - remind the interviewee of the non-retaliation policy
- Document the investigation carried out objectively. This also includes documentation on data storage and any restrictions due to the fact that personal data is involved. If the evidence is doubtful, or if the interviews have not clarified the case, this must be indicated.
 - Conclude on the basis of the complaint, which includes the “who, what, where, when and how” and what has been established during the investigation.
 - Write a report describing the background, the documents received, the investigation process followed, the conclusions and any follow-up action to be taken. The investigator's personal opinion and conclusions cannot be included in the report. The report includes details of the investigator, the people involved (anonymous or not), the parties contacted and a date.

The time required to complete an investigation may vary according to its complexity. The aim is to conclude the investigation as quickly as possible, ideally within sixty days of receipt of the complaint, except in exceptional cases and depending on the seriousness of the facts.

3.3 Report

At the end of the mediation or investigation, the complaint manager draws up a final report summarizing the information gathered and proposing recommendations for actions to be taken, processes to be reviewed or developed, and any solutions for improvement (tested or to be tested).

This report is transmitted to the designated members of the Complaints Committee, and is intended to assist it in making future decisions. Examples of information that may be included in the report:

- Background and summary of the initial situation
- Documents received
- Process and methodology used
- Actions taken; people met/interviewed and dates of interviews; structure of interviews; other information relating to the case studied
- Missing elements; documents not obtained or incomplete; people not interviewed; constraints encountered that had an impact on the case
- Analysis of the situation and hypotheses to be confirmed or refuted
- Results of mediation or investigation

- Detailed conclusions and recommendations for each person involved (victim(s), perpetrator(s), witness(es), etc.).

3.4 Follow-up and closure of the case

If the investigation confirms **criminal activity**, the complaints manager notifies the relevant legal authorities.

If the complaint is handled internally, **measures and sanctions** may be applied to the individuals and companies concerned. **Only the designated members of the Complaints Handling Committee are responsible** for the measures and sanctions to be applied.

Depending on the nature and seriousness of the incident and the status of the person concerned, different sanctions may be adopted. Here are a few examples of measures and sanctions depending on the persons involved:

For **internal employees** (reflected in work regulations):

- Written warning
- Professional retraining or coaching
- Reassignment or suspension of current job
- Removal from a management position
- Compensation adjustments
- Termination of contract
- Legal proceedings

For partners' employees (reflected in the contract with the partner):

- Termination of collaboration with the employee
- Appropriate training
- Legal proceedings

For **partners** (reflected in the contract):

- Recommendations to remedy the cause directly
- Increased monitoring
- End of contract
- Additional controls.

The appointed members of the Complaints Committee justify their decisions in an objective report that is as factual as possible.

All stakeholders (whistle-blowers, suspects, persons involved in the case, etc.) are notified of any sanctions imposed within a period not exceeding three months. In exceptional circumstances, where the investigation takes longer, this period may be extended to 6 months. If the information has been passed on to the judicial authorities, the outcome may take months or even years.

3.5 Reporting on the results

Each year, if complaints have been reported, an annual report is drawn up by the complaints manager, with the help of the integrity advisor. This report may cover various points, such as :

- How many complaints were filed?

- What percentage of these complaints were inadmissible or unfounded?
- What was the average time taken to process an alert (from receipt to closure)?
- What subjects were most frequently raised (e.g. moral or financial integrity)?
- What is the geographical breakdown of complaints received (by whistle-blower, victims, accused, etc.)?
- How many investigations have been carried out?
- In how many investigations was there an actual violation of integrity?
- How many investigations have been sanctioned or reported to the legal authorities?

This report may also point to possible solutions to avoid the recurrence of problems within Viva Salud. The integrity manager will be responsible for monitoring the implementation of the Integrity policy, in order to evaluate and monitor preventive measures and the reporting mechanism.

4. Awareness-raising and training

To promote a culture of integrity within the organization, Viva Salud, with the help of the integrity manager, is committed to informing all persons closely or remotely linked to Viva Salud's activities of the existence of a reporting mechanism via its website, social networks or newsletter.

It will **provide training for all staff at least once a year**. It shares the annual complaints report with the Annual General Meeting, held in June when the previous year's accounts are closed.

The ultimate aim of these integrity trainings and awareness campaigns is to create an awareness and culture within the organization. Employees must understand and adhere to Viva Salud's values. In this way, they will feel more committed. New members of staff will be informed immediately on recruitment by receiving and signing the ethical code and also by reading the internal integrity policy, which sets out the reporting and complaint handling processes.

Viva Salud is also committed to having all **volunteers** who help Viva Salud sign the ethical code. It also commits to have the ethical code signed by participants in the solidarity trips it organizes to its partners' sites. It also organizes **discussions on integrity with its partners during partner visits**.

Finally, **the integrity advisor and the complaints manager will take part in continuous training** to keep up to date and maintain their knowledge of the subject.

5. Evaluation

In order to be continuously effective, the integrity advisor will monitor the effectiveness of the process. He/she may, for example, ensure through internal interviews that the whistle-blowing mechanism is well known to all and see if there are any problems encountered by staff in using it.

The integrity advisor also commits to take part in external meetings with federations. He/she can also compare his/her process with that of other NGOs and see what works better elsewhere, and adapt the internal process where necessary.

6. References

- Integrity Charter
- Viva Salud ethical code