



Integrity Policy

Stichting Enablement

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Policy register

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INTRODUCTION

Enablement Foundation (EF) vision is to contribute to the empowerment and the improved well-being of adults and children with disabilities in lower and middle-income countries. We do this by investing in impactful and down-to-earth CBR programmes which are implemented by local organizations in their communities. We are working with and within existing community systems, by understanding their social dynamics, their struggles and gaps that exist in the available services. We believe that long-lasting changes are possible only if they happen within and by the communities. Therefore, we work and support diverse community stakeholders that can have a positive contribution and impact on the lives of people with disabilities and especially children with (severe) disabilities.

Integrity cannot be guaranteed just by drawing up a number of rules of conduct. Attitude and “wanting to do things properly” are also important aspects of integrity. We can think of integrity as having a hard side and a soft side. The hard side consists of regulations, both internal and external, and the soft side is the organizational culture at EF. Integrity in an organization means being open and respectful towards one another, avoiding deception and that management sets good examples through exemplary conduct. Apart from the contents of the Integrity Policy, EF employees are obliged to comply with legal requirements and abide by common social norms and values. In case of conflict between legal requirements and the Ethics policy, the legal requirements must prevail.

This Policy provides guidance to EF employees during their professional activities. EF does not seek to regulate employee’s private behavior. Nevertheless, employees should be aware that during time considered private, they can be perceived by others as representatives of EF especially while on duty. Employees are therefore expected to behave appropriately and make use of common sense.

VALUES

EF’s leadership is guided by a set of values that define our relationship with clients, partners, employees and the community in which we operate. They are Inclusion, Transparent, Independent and Sustainable.

- **Inclusion:** The inclusion of all will be empowered and promoted, thus enhancing equity and equality.
- **Transparent:** EF is transparent. EF strives to exchange all information required for successful collaboration, decision making and accountability purposes.



- **Independent:** EF is independent. EF acts according to our own values and judgment, not colored by religion, politics, ethnicity or the influence of any group or class.
- **Sustainable:** EF strives for sustainable development. EF takes a multi-stakeholder and long-term perspective.

EVALUATION AND REVISION

New employees are specifically informed about the Integrity Policy during their employment conditions interview. The Integrity Policy will also be addressed during the Performance Management Cycle.

This policy will be periodically reviewed and modified to ensure that it remains relevant to the needs and realities of the organization. Any changes in the policy will be binding for all recipients from the moment the updated document has been communicated. This policy is addressed to EF Staff, Associates, interns and volunteers; it consists of a Code of conduct, an Internal complaints procedure and a Whistleblowers procedure.

1. CODE OF CONDUCT

Professionalism

- Employees will uphold the integrity and reputation of EF by ensuring that their professional and personal conduct is demonstrably consistent with EF's values and standards.
- Employees will seek to maintain and enhance public confidence in EF by being accountable for the professional and personal actions they take and ensuring that they manage the power that comes with their EF position with appropriate restraint.
- Whilst observing the requirements of the Code of Conduct and other internal regulations, if applicable, employees will also be sensitive to, and respectful of, local laws, customs and culture, even if the norms and values in that cultural context differ from the Code of Conduct; as long as these are not in contradiction with international human rights norms, humanitarian laws.
- Employees will if necessary seek (and will receive) support and advice from EF's line management.
- Employees will not work under the undue influence of alcohol, illegal and/or intoxicating substances on EF premises, or during business trips.



Mutual respect, non-discrimination and child protection

- Employees will treat all people with respect and dignity and challenge any form of harassment, discrimination, intimidation, exploitation or abuse.
- Employees will contribute to a working environment characterized by mutual respect, integrity, dignity and non-discrimination.
- Employees will ensure that their relationships and behavior are not exploitative, abusive or corrupt in any way.
- Employees will respect all peoples' rights, including children's rights, and will not engage in any form of sexual abuse or exploitation of any persons of any age.
- Employees will not have sexual relations with children;
- Employees will not have sexual relations with beneficiaries of EF's work, recognizing in both cases the inherent unequal power dynamics and that such behaviors can undermine the integrity and credibility of EF's work.
- Employees will not exchange offers of employment, employment, goods or services for sex or sexual favors, nor any forms of humiliating, degrading or exploitative behavior.
- Employees will use their best endeavors to report any such behaviors, as mentioned above, or malpractice in the workplace by others to their line management or through recognized confidential reporting systems.

Conflict of Interest

- Employees will perform their duties and conduct their private life in a manner that avoids possible conflicts of interest with the work of EF.
- Employees will declare any conflict of interests in matters of official business which may impact on the work of EF (e.g. contract for goods/services, employment or promotion within EF, partner organizations, beneficiary groups).
- Employees will seek to ensure that their personal activities, views and opinions are not seen as being the official position of EF.
- Even when the giving and acceptance of gifts is normal cultural practice employees will reject monetary gifts or inappropriate gifts from governments, beneficiaries, donors, suppliers and other persons, which have been offered to them as a result of their association with EF. Where the giving and acceptance of gifts is normal cultural practice, employees will ensure that such gifts are within the limits of reasonable judgements and will report them to EF's line management; and where appropriate hand them to EF.

Confidentiality and use of EF facilities

- Employees will be responsible for the use of information, equipment, money and resources to which they have access by reason of their association with EF.
- Employees will use their discretion when handling sensitive or confidential information.

- Employees have a duty of confidentiality regarding information that comes in their knowledge pursuant to their position and profession, insofar as such obligation arises from the nature of the matter at hand or has been expressly imposed on them.
- Employees will seek, unless it is not reasonably possible, authorization from EF's line management before communicating externally to the press in EF's name and will avoid any unintended detrimental repercussions for their co-workers, EF or themselves.
- Employees will appropriately account for all EF money and property, (e.g. office equipment, computers including the use of internet, email and intranet).

Internet, E-mail use and Data Privacy and Security

- The internet system, which employees access through their EF computer, and the e-mail system are available to them for business use. Employees should use those principally for work-related duties. Occasionally and briefly employees are permitted to use them for personal use, provided that this use does not disrupt normal daily activities and/or the technical infrastructure.
- Employees are not allowed to gain unauthorized access to non-public sources on the internet and to visit internet sites that contain racist, discriminating, insulting or offensive material, unless work-related. Neither are employees allowed to download or install such content on IT equipment provided by EF.
- Content monitoring of IT equipment will only take place in the event of compelling reasons. If employees are suspected of violating the rules of this policy, monitoring may only be performed by EF's CEO for a fixed (short) period and is limited to internet and e-mail traffic data. When data traffic monitoring has to be performed by the IT staff at EF, it has to be commissioned by the CEO. Such a decision clearly indicates when this temporary authorization ends. An intention to monitor the content of e-mail is communicated to them in advance, unless this is not reasonably possible or might violate the interest of the investigation. In this last case employees will be informed as soon as the investigation is finalized.
- Employees consent to EF holding and processing data relating to them for legal, personnel, administrative and management purposes and in particular to the processing of any "sensitive personal data" as defined in Dutch Law and European legislation.
- Employees consent to EF making such information available to administrative, tax or governmental authorities, for the sole purpose of complying with legal and contractual obligations.

Personal data

- Employees will obtain the consent of the data subject, provide privacy notices and the reason for processing data.

- Employees will obtain the written consent of subjects identifiable in photos, videos, audios and other formats for them to be used in hardcopy and online media, by using the appropriate form.
- Employees will not collect nor request data beyond what is necessary for a specific task/project and will process them in a way that is consistent with the specified purpose(s).
- Employees will make sure data is accurate, updated when necessary and not keep it longer than needed.
- Personal data must be processed in accordance with data subject rights under the General Data Protection Regulation (GDPR).
- Employees will handle data in their possession with care in order to limit the chance and the impact of an incident.
- Employees will store data on EF's secure environment (N-drive, NEOFORCE and its organisational server) and make it available only to the people who need to use/analyze it.
- Employees will protect with a password the access to the zip-file and the Cloud services with which they send data. Employees will share the passwords with the recipient of the data in a separate email or by phone.
- Employees will remove the data from the Cloud as soon as the recipient has stored the data.
- Employees will not transfer European Union citizen personal data to a country outside of the European Economic Area, unless consent was given by the person involved or the country has equivalent levels of protection for personal data.

Safety and security

- Employees will do their utmost best to protect the health, safety, security and welfare of all EF employees, interns, volunteers, beneficiaries, contractors and students enrolled in EF courses in The Netherlands or abroad.
- Employees will undertake and act on appropriate risk assessments.
- Employees will behave in such a way as to avoid any unnecessary risk to the safety, health and welfare of themselves all EF employees, interns, volunteers, beneficiaries, contractors and students enrolled in The Netherlands or abroad.

Bribes and other illegal behaviors

- Employees will promote human rights, protect the environment and oppose criminal or unethical activities.
- Employees will use their best endeavors to protect the natural environment and work in a sustainable way.

- Employees will contribute to preventing all forms of criminal or unethical activities.
- Employees will also notify EF's line management if they face any criminal charges during their association with EF that may impede their ability to perform the duties of their position subject to national legislation.
- Employees will not condone the payment of bribes. These include, but are not limited to, illegal charges imposed for the release of goods from customs, "taxes" levied by local authorities in addition or beyond to the legal maximum, or illegal charges imposed by local authorities in exchange for mission registration, programme approval, visa or work permits. Employees will not accept a bribe of any kind.
- Employees will not accept or demand direct or indirect remunerations, attendance fees or commissions, other than contractual agreements agreed upon between EF and the founder, or to accept inheritances or testamentary gifts from persons with whom they only come into contact by virtue of their position at EF. This applies to gifts of a value of EUR 50.00 or more, or any other amount formally registered in accordance with the local context.
- Any gifts made, that may obligate (or appear to obligate) them, are to be accepted on behalf of EF and handed in to EF's line management, who will decide if they can keep the gift.

Sanctions

In the event employees are suspected of misconduct under this policy, an investigation will be carried out by EF's management, or externally commissioned, in order to determine whether or not a violation occurred. In the course of this investigation employees will be invited to provide any element that could help the investigation. Should the violation be confirmed, employees will be facing disciplinary sanctions, without the prejudice to eventual civil and criminal sanctions. Depending on the severity of the misconduct, the sanctions can be one/several of the following:

- A reprimand
- A written warning in the personnel file
- A suspension
- A (immediate) dismissal
- A police reporting

Employees will be informed by registered mail on the outcome of the investigation and, if applicable, of the disciplinary sanction(s) decided upon.