



# Integrity Policy 2025

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[www.seeyoufoundation.nl](http://www.seeyoufoundation.nl)

SeeYou Integrity policy

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# Introduction

SeeYou is committed to helping people with a (visual) disability. We see them and help with (eye) care, education, work and inclusion. Because every person being is valuable and precious. Based on our core values, we believe this work should be done with integrity. Integrity is an important theme, also in the sector in which SeeYou is active. High demands are rightly placed on organisations to prevent transgressive behaviour or to act when a misstep is committed. SeeYou wants to help and empower people. Often, these are people who are at high risk of abuse and transgressive behaviour because of their disability and who experience unequal treatment in various ways. It is therefore of the utmost importance that these people are treated with integrity and that financial resources received by SeeYou to do this work are used properly. This integrity policy and various related guidelines and procedures describe how SeeYou safeguards integrity within the organisation and collaborations, in accordance with the standards of the CBF (Central Bureau on Fundraising), ANBI (General Benefiting Institutions), and ISO 9001 (quality management system).

The Code of Conduct forms the basis of the integrity policy that describes what we mean by acting with integrity. It is based on our core values - every person being is precious, there is room for everyone, charity and justice - and forms the basis for all our actions. We also subscribe to the Partos Code of Conduct with guidelines on cooperation with civil society organisations in project countries, the set-up of a professional organisation and agreements on communication and fundraising. Our Integrity Policy describes SeeYou's vision on integrity and discusses the structure of the integrity system. Subsequently, an overview of the reporting system is included in Annex 1, so that it is clear which stakeholders can report inappropriate behaviour in which ways. Annex 2 contains an overview of the steps of the reporting system. Annex 3 contains the summary of the code of conduct and the reporting system shared with partners. The child protection code of conduct can be found in Annex 4. Annex 5 contains a summary of the Partos-9001 standard, describing how SeeYou complies with it. Finally, Annex 6 includes the Prisma complaints procedure, which complainants can fall back on in extreme cases (if the SeeYou procedure is not satisfactory).

# 1. SeeYou integrity policy

## Framework

The Partos Code of Conduct serves as the framework for this integrity policy. The standards from it form the basis for the policy as SeeYou is certified for Partos 9001. Annex 2 lists the standards and indicates how they are met.

## Structure integrity system

The Integrity System Guide from Partos, Charities Netherlands (Goede Doelen Nederland) and the CBF, was used to develop this integrity policy.

In summary, SeeYou's integrity system includes the following components:

- **SeeYou integrity statement** (chapter 2): how we view and implement integrity;
- **Code of Conduct SeeYou** (chapter 3): the basis of the integrity policy that defines what we mean by acting with integrity;
- **Preventive policy** (chapter 4): how we aim to prevent transgressive behaviour;
- **Reporting system** (chapter 5): reporting system and how (reports of) unethical behaviour are dealt with;
- **Awareness and continued learning** (chapter 6): how to equip stakeholders on this topic;
- **Roles and responsibilities** (chapter 7): who holds which responsibility within this theme;
- **Accountability and communication** (Chapter 8): Communication around reports of non-integrity.

## Different responsibilities

**To whom does this integrity policy apply and up to where does SeeYou's responsibility extend?**

An important principle is that SeeYou will always take action if a violation of integrity is detected. Our integrity policy focuses on the internal organisation and the responsibility towards implementation partners and cooperation partners in the South and North and the people we reach with our work. The conditions imposed

apply to everyone who works for or on behalf of SeeYou. The proper functioning of the integrity system requires that it is clear who has which role and that the associated responsibilities are clear. Chapter 7 describes individual roles and responsibilities.

### **Internal organisation**

**SeeYou employees** (including temporary staff, consultants, self-employed workers and SeeYou representatives)

SeeYou is directly responsible for the integrity of its employees and representatives. All of SeeYou employees sign the code of conduct when they start at SeeYou. Our HRM policy gives substance to this, both for our own employees and those representing SeeYou in other positions.

### **Interns, volunteers and ambassadors**

Several volunteers are active for SeeYou in the Netherlands. The rules of integrity for volunteers are laid down and form part of the volunteer contract they sign at the start of the volunteer work. The set integrity rules also apply to interns, entrepreneurs and young people who work and travel with SeeYou; they must therefore sign the code of conduct.

### **SeeYou Supervisory Board (SB)**

The Supervisory Board has a supervisory role in implementing the overall policy, including the integrity policy. All members of the Board sign the code of conduct when they start at SeeYou.

### **Donors**

SeeYou can do its work because of financial support from donors, both private donors as well as churches, companies, wealth funds and institutional funds. Although these donors are indispensable for the work being done, this does not mean that cooperation with all donors is unreserved. When donors make demands that do not coincide with the policy pursued by SeeYou (e.g. in the field of integrity), a decision can be made not to enter into a collaboration with a donor or to end an existing collaboration. Also when donors and suppliers present themselves with issues that are not in line with the integrity policy (including the code of conduct) or the (I)CSR policy of SeeYou, the decision may be taken not to enter into a collaboration with this party or to terminate an existing collaboration.

## **Active direct and indirect external accountability**

### **Implementation**

partners and other cooperation partners (both South and North)

Implementation partners are (local) organisations responsible for implementing a project. They do this under contract with SeeYou. In this partnership, SeeYou has an active and direct responsibility as donor. Here, SeeYou can primarily co-decide on the design, modus operandi, behaviour and sanctioning. SeeYou explicitly asks all implementation partners to endorse SeeYou's integrity policy. With implementation partners, this is recorded in the contract, the Grant Funding Agreement.

Cooperation partners are organisations with which SeeYou enters into a partnership to achieve common goals. Here, there is indirect responsibility for each other's activities. This is where SeeYou relies on the systems of its cooperation partners. In all partnerships, we abide by the integrity policy by sharing SeeYou's policy, code of conduct and reporting system with the collaboration partner.

When partner organisations in the projects also come into direct contact with children, they are expected to take additional measures to protect these children during project activities.

### **Target**

SeeYou works towards a world that does justice to people with (visual) disabilities. Practice and research show that our target group is extra vulnerable to (sexual) violence and transgressive behaviour. Therefore, SeeYou asks implementation partners to have their own reporting system where people from the target group can report when they are confronted with transgressive behaviour. This is stipulated in the Grant Funding Agreement.

At the same time, there is always the possibility for implementation partners, people from our target group and others involved with SeeYou to use the SeeYou reporting system referred to on the website. Where appropriate, SeeYou will contact the implementation partner on the basis of the report and follow up on the report received. (See Annex 1 for the overview of the reporting system and contact details).

## 2. SeeYou integrity statement

People with (visual) disabilities in developing countries are almost without exception among the most marginalised groups. They are often not seen, have no access to healthcare, education or work, and often live in extreme poverty. This affects us.

That is why we are committed to access to (eye) care, education and work. We invest in people with disabilities themselves, their families as well as in making the environment and systems inclusive. This way communities are a place where people with (visual) disabilities are seen and are enabled to participate in a meaningful way! This is what drives us and what we always keep in mind in the choices we make.

We are accountable for our work to each other, to donors and to our neighbour in the South. Any form of transgressive behaviour goes against what we stand for: that we see every human being as valuable and precious, created in God's image. SeeYou will therefore act appropriately when such behaviour is observed, taking into account the nature and seriousness of the transgressive behaviour. Precisely because doing justice is at the heart of what SeeYou stands for, this may be expected of the organisation.

### **Professional responsibility**

As SeeYou, we work towards sustainable better living conditions for our (often vulnerable) target group. SeeYou therefore considers it important to treat each other respectfully, honestly, equally and transparently. Integrity is therefore seen by SeeYou as a professional responsibility. How you deal with others is part of your professional conduct. SeeYou also uses a system of checks and balances with clear rules and agreements in an environment that promotes integrity and with control mechanisms that make our behaviour verifiable for ourselves and for others. The code of conduct is the most important basis for determining whether we act with integrity.

### **Acting with integrity is being with integrity**

Acting with integrity focuses on dealing appropriately with unequal relationships, financial resources received and (often vulnerable) people we encounter in our work. It is not about acting with integrity alone; it is important that we have integrity as individuals. At SeeYou, integrity is therefore woven into everything we do as an organisation. It is

reflected in our (policy) choices and in the way we treat each other.

### Integrity system

Everyone has the right to be protected from all forms of harm, abuse, neglect or exploitation. SeeYou is committed to doing its utmost to create a safe environment. An environment free from discrimination on any grounds, and free from any form of harassment, including sexual harassment and bullying.

Our integrity policy makes acting with integrity concrete. At the same time, we also know that we cannot completely rule out integrity violations. We can judge others based on the behaviour we see but are aware that we do not have full insight into the elaboration and application of this policy by all those involved. Everything is aimed at preventing transgressive behaviour (*prevention*). In addition, the policy focuses on handling and accounting for reports adequately and carefully when appropriate (*reporting and response*). In doing so, all complaints are taken seriously and treated with respect and confidentiality. No one should be the victim of making a complaint!

# 3. SeeYou code of conduct

SeeYou considers every human being as precious and valuable. It affects us that people with disabilities are often not seen, and are excluded in society. That is why we are committed to providing access to (eye) care, education and work in Africa and Asia. We invest in people with disabilities themselves, their families and in making the environment and systems inclusive. This way communities are a place where people with disabilities are seen and are enabled to participate in a meaningful way. To achieve this, SeeYou works with people with (visual) disabilities and their representative organisations, aid organisations, companies, (local) partners and governments.

At SeeYou, we also want to handle privacy and personal data we hold with integrity, this includes data of employees, colleagues at partner organisations, donors, the people we work for and our network. We want to do this with integrity, care and responsibility.

SeeYou's work focuses on the (vulnerable) person with a disability and not on personal gain. We receive funds from individuals, companies and grant providers, among others, who provide us with these funds in confidence that we do our work, in line with our mission, vision and core values, with integrity, care and responsibility.

We expect everyone involved (staff, members of the Supervisory Board, interns, volunteers, ambassadors, consultants, donors and partners) to show that we are worthy of this trust. In this code of conduct, we describe the integrity we expect from those involved with SeeYou. That does not mean that this code of conduct provides and answer on how to act in every situation. Therefore, we expect everyone to act in line with our core values (see box).

## **Every person being is precious and valuable**

Every person being is created in God's image. Therefore, we treat everyone equally, regardless of background, gender, sexual orientation, religion, age or disability. We see every human being as valuable, with unique talents and gifts. We believe every person has been given responsibility for the people and world around them, and the freedom to make choices. We believe that people can reach their full potential in relation tot their neighbour and Creator.

## **There is room for everyone**

Multicolour is part of God's creation. We recognise that we live in a broken world, in which many – especially people with disabilities – are not seen in society. We believe that a society can only truly flourish when everyone has a full place.

## **Charity and justice go hand in hand**

We are called to love ou rneighbour, and do justice, especially to those affected by injustice and poverty.

As a stakeholder, I endorse the following:

1. **I act, as a professional and also personally, in line with SeeYou's core values and am aware that my actions influence the way in which people view SeeYou, the sector and the work we do. I also realise that in my private actions I can be seen as a representative of SeeYou.**
  - I always act in the interests of SeeYou as well as the people SeeYou wants to serve in its work.
  - Within SeeYou's core values, I respect differences in culture and customs, adapt my actions accordingly and am open to gaining knowledge and experience about other cultures. If differences lead to acting without integrity and unethical conduct, I distance myself from them and will report this via the reporting system.
  - Integrity requires me to have a professional responsibility and attitude towards colleagues, donors, partners and other stakeholders. I am accountable for my thinking and behaviour.
  
2. **I respect everyone's dignity and treat everyone equally, based on the core value that every person is precious and valuable.**
  - Regardless of nationality, gender, sexual orientation, age, religious belief, disability and social background, I treat everyone equally. As equality is the basis of cooperation, I actively contribute to shaping cooperative relationships based on mutual respect, equality and integrity.
  - Given the nature of SeeYou's work, I will regularly meet people who are vulnerable to or victims of inappropriate behaviour. By asking the right questions and listening attentively, I try to demonstrate my commitment to them.
  - I will do everything possible to prevent my behaviour from being offensive to my (vulnerable) neighbour. I also reject discrimination, unwanted intimacy, (sexual) harassment, bullying, aggression, (sexual) violence, abuse, exploitation and any other form of (allusions to) unwanted behaviour, in words as well as behaviour, and I will not be involved in this in any way.
  - I actively contribute to the proper treatment of every child and subscribe to the *Child Protection Code of Conduct* (Annex 4 of the Integrity Policy) which articulates how we protect children from inappropriate behaviour and abuse.
  - I am aware that I may find myself in situations where unequal power relations arise towards people who are in a dependent position of SeeYou. If such situations arise, I do not abuse my position in any way and treat everyone equally and with respect at

all times.

- SeeYou has a legitimate interest to be informed of criminal convictions, official warnings and reprimands if these could harm its work and (start to) interfere with my functioning. If I have previously been convicted, warned or reprimanded for undesirable behaviour towards vulnerable people, I will inform SeeYou so that it can be considered how to deal with it. This also applies if I am criminally prosecuted during my relationship/involvement with SeeYou.

### **3. I handle responsibly the (financial) resources and informations entrusted to me as part of my work for SeeYou.**

- I reject and act against abuse of power, corruption, fraud, theft, exploitation and other financial violations when I encounter forms of these. Nor will I offer, give, promise or accept bribes. In doing so, I will act in accordance with SeeYou's anti-corruption policy.
- SeeYou is able to do its work because of financial support from donors. I carefully handle the financial resources at my disposal and am transparent and truthful in accounting for the use of funds, regardless of size.
- As a stakeholder, I act from pure motives and am not out for personal gain. I also avoid conflicts of interest and the abuse of my position or authority. Transparency about ancillary activities and other matters on a financial or relational level is essential if there is a connection with SeeYou's work. I inform the organisation about existing or future ancillary activities and do not accept them if they conflict (now or in the future) with SeeYou's work and interests.
- I communicate in an open, transparent and substantive manner without judging or dismissing individuals. I am also aware that my professional or personal communications may (unintentionally) have adverse consequences for the organisation. I will only communicate on behalf of SeeYou if it is expected from my role; if it is not part of my role, I will not publicly engage in political, religious or ideological discussions in title as a person involved with SeeYou.
- I will handle confidential information at my disposal in a careful and responsible manner. This means that I will not share (access to) that information with others if I do not have a good reason to do so, I do not manipulate information content and I act in accordance with the relevant privacy legislation. I only collect footage of (vulnerable) people if they are portrayed in a respectful, dignified manner, and if they consent to the collection of footage.
- Help and support provided by SeeYou is not provided in exchange for a favour from the other person. Therefore, I do not accept large or significant gifts or gratuities. If

refusing a gift is culturally undesirable, the gift is reported to the integrity officer and relinquished to SeeYou.

- Entering into (sexual) relationships with beneficiaries in exchange for help or support is not allowed. Entering into (sexual) relationships with children is punishable, and will not be tolerated by SeeYou in any way.

#### **4. I share responsibility for the welfare of everyone involved in SeeYou's work, and the proper functioning of the integrity system within the organization.**

- To actively help build a well-functioning integrity system and an environment that is safe for vulnerable people, I make a positive contribution to the organisational culture of openness and mutual responsibility. I set aside time to discuss ethical dilemmas I experience and encounter in my work.
- When I encounter forms of non-integrity, I take responsibility by discussing and reporting it. In doing so, I first address the person(s) involved to rule out misinterpretation of the situation. If the actions deviate from the desired behaviour as described here, I report via the reporting system to stop or prevent abuse of power, financial or interpersonal violations as soon as possible.
- When I see the opportunity or need to improve the operation of the integrity system, I will inform SeeYou's integrity officer.
- SeeYou encourages and supports implementation partners in the South in shaping integrity policies.
- Acting with integrity cannot be described in a single document. That is why I always act in line with both SeeYou's core values and this code of conduct. With this code of conduct of SeeYou, I subscribe to the guidelines, procedures and policies as included in the quality manual, including the *integrity policy, code of conduct for the protection of children, communication guidelines, policy on privacy and information protection, anti-corruption policy, procurement policy, the management regulations and the regulations of the Supervisory Board*.
- There are various channels within the reporting system where victims or those involved can report undesirable behaviour, non-integrity or (suspected) (serious) abuse. Confidentiality, care and protection are important principles in this respect. Different regulations that together form the reporting system describe how victims and those involved are protected.

### **Signature**

By signing, I confirm that I will abide by the contents of this code of conduct. I am aware that violation of it will result in disciplinary action. The disciplinary measures and sanctions are

described in the integrity policy.

Agreed and signed at ..... on .../.../...

*First initial + name*

Concerned: ..... .....

Signature

# 4. Prevention policy

## General

SeeYou wants to prevent any violation of integrity. This means that it must be clear to everyone what a violation is; the code of conduct forms the basis for this. Violations can stem from ill will but also from ignorance and incompetence. This is why the preventive policy focuses not only on making the reporting system known, but also on mutual awareness. Because: no matter from where an integrity violation arises: the consequences are no less significant and potential victims must be protected from perpetrators and potential perpetrators from themselves. We also need a system of checks and balances with clear rules and agreements, a culture that promotes openness and control mechanisms that make our behaviour verifiable for ourselves and others.

## Code of conduct

The code of conduct forms the basis of the prevention policy. All employees, interns, volunteers, ambassadors, consultants, other representatives and members of the Supervisory Board sign this code of conduct upon commencement of employment. This makes it clear to all representatives of SeeYou which behaviour is expected of them and which behaviour is inadmissible so that people can be held accountable for this. This working method is also applied to everyone who travels with SeeYou. The code of conduct forms the standard against which a breach of integrity can be assessed. At the same time, acting with integrity cannot be described in a single document. Therefore, those involved are expected to always act in line with the mission and vision of SeeYou, even if matters are not described in concrete terms.

## Preventive operation reporting system

A well-designed and functioning reporting system has a preventive effect. If those involved see that standards described are maintained and acted upon, it contributes to credibility in the integrity and reporting system as set up (see below). A well-functioning integrity system will also lead to more openness and willingness to report violations.

## System of checks and Balance

A system of checks and balances is needed to check the actions of those involved for non-integrity. SeeYou's integrity system incorporates several internal and external checks and balances that contribute to a preventive policy on integrity.

## Internal check and balances

- **HRM-policy**

SeeYou is directly responsible for the integrity of its employees and representatives. The HRM (Human Resource Management) policy is therefore an important link in the integrity system.

- **Annual review of integrity policy**

The integrity policy is reviewed annually by the integrity officers. It is approved each year by the MT and shared with the SB.

- **Code of conduct**

The code of conduct is the starting point for all our actions. Those involved have signed the code of conduct and know what behaviour is expected of them and what behaviour is unacceptable so that they can be held accountable for this.

- **Certificate of good conduct (VOG)**

A Certificate of Good Conduct (VOG) is issued by every new employee and member of the Supervisory Board. Volunteers who come into direct contact with the target group and supporters are also asked to do so.

- **Ancillary positions**

Each employment contract stipulates that the employee will not hold any, relevant (paid or unpaid), ancillary position without permission. In addition, upon signing, employees also undertake to follow up on/comply with obligations arising from (future) guidelines and to treat any information that becomes available to them from work at SeeYou confidential.

- **Internal discussion of integrity policy**

SeeYou organises at least twice a year a moment in which attention is paid with the team to (a part of) the integrity policy. At least once a year, a Moral Deliberation takes place with all employees. Here, moral dilemmas relevant to the work of SeeYou are reflected upon together.

- **Measures when leaving SeeYou**

When an employee finishes their contract with SeeYou, that employee returns the items he<sup>1</sup> has had on loan from the organisation. The departing employee is

expected to keep information obtained during employment confidential. Files containing SeeYou data on private devices need to be deleted by the departing employee.

- **Various internal policy documents, guidelines and procedures**

Several documents describe the specific integrity actions expected. The integrity policy forms the basis for these documents.

- **Internal control**

Annually, as part of the ISO-9001 audit, an internal auditor checks the operation of the internal control measures. During this audit, they check whether internally established procedures and regulations are complied with. If the internal audit shows that things may not have gone well, further investigation can be carried out. The auditor reports to the director. The director and integrity officer may propose corrective measures.

- **Travelling with SeeYou**

Before a work trip to a project site, the person traveling is asked to review the code of conduct again. This is because there are specific integrity risks and challenges that may be less prevalent in the day-to-day working environment. This may be due to cultural differences and different power relations, among other things. Therefore, the review of the code of conduct is included as a standard step in the development of the travel plan.

### **External check and balances**

In addition to the aforementioned internal checks and balances, external checks and balances are also used. External checks and balances consist of various quality systems against which internal processes and practices can be periodically tested. seeYou tests itself against the following quality systems:

- **Recognition scheme for charities (CBF seal of approval)**

SeeYou holds the CBF seal of approval based on the Recognition Scheme for Charities. This quality mark sets requirements for governance, policy, fundraising, information and communication, spending of resources and reporting. Its principles are applied, including separation of supervision and implementation.

- **ISO 9001**

This standard and associated certification focuses on critical control, adaptation and optimisation of processes. SeeYou has been certified for ISO 9001 since 2003. This means that there is a documented quality management system, consisting of a formally defined quality policy defining established procedures, processes and responsibilities.

- **Partos 9001**

Partos 9001 concerns the sector-specific application of ISO 9001. The accompanying Partos code of conduct sets out the standards and values endorsed by SeeYou, as a member of Partos, as the basis for its actions, including in the area of integrity. SeeYou is certified for Partos-9001. Supervision is carried out by accredited certifying bodies. Certification for Partos 9001 provides exemption from the organisational test (ORIA) of the Ministry of Foreign Affairs.

### **Check and balances for our implementation partners**

SeeYou collaborates with local implementation partners. SeeYou is in contact with the target group through these implementation partners. SeeYou therefore has no direct relationship with the target group; this lies with the implementation partner. Because the implementation partner is in direct contact with the target group, she herself has a direct active responsibility in terms of integrity, with SeeYou having an active indirect responsibility. This means that SeeYou does not decide on the policy of the implementation partner, but has an indirect influence on it. Such as through the agreements laid down in the Grant Funding Agreement and the assessment on the implementation partner. To prevent implementation partners from not acting with integrity, SeeYou also uses the necessary checks and balances. Implementation partners undergo the following assessment:

- **Due diligence**

When SeeYou starts working with an implementation partner, a so-called 'Due diligence investigation' is carried out. This examines whether the partner meets the requirements that the cooperation imposes on the implementation partner. It also looks specifically at the implementation partner's policy on integrity and GDPR (General Data Protection Regulation). This investigation provides advice on whether the collaboration can be entered into or not. The due diligence investigation applies to both Northern and Southern implementation partners.

- **Audits by external auditors**

These audits are organised by SeeYou when there are signs that there is something

lacking in the financial (management) capacity of implementation partners. The audit is conducted by an independent and expert consultant and covers all key areas of financial management: planning and budgeting, basic accounting systems, financial reporting, internal controls, grant management and financial personnel.

### **Risk management**

SeeYou conducts an annual risk analysis prior to the annual planning. This includes integrity-related risks.

# 5. The reporting system

## **Enforcement**

SeeYou makes every effort to avoid acting without integrity. Nevertheless, an undesirable situation in which integrity is at stake may still occur. When a staff member, intern, volunteer, ambassador, consultant other representative or member of the Supervisory Board encounters a form of non-integrity, he takes responsibility by discussing and reporting it. In doing so, he first addresses the person(s) involved to rule out misinterpretation of the situation. If the action deviates from the desired behaviour as described in the Code of Conduct, he reports it via the reporting system to stop or prevent abuse of power, financial or interpersonal violations as soon as possible. For making reports, SeeYou has a reporting system where a (possible) violation can be reported in a confidential manner. In doing so, SeeYou tries to ensure as much as possible that those involved experience the space to report (a suspicion of) a violation and that they can rest assured that the report will be handled as carefully and adequately as possible. SeeYou takes action so that it is clear to everyone that a violation of integrity will not be accepted. This is part of doing justice.

## **Code of conduct as standard**

SeeYou's code of conduct describes how those involved in SeeYou are expected to behave. The code of conduct is therefore normative. Showing behaviour described in the code of conduct as not acceptable counts as a breach of integrity.

## **Reporting system**

SeeYou has set up a reporting system that gives a reporter various options for making a report. All those involved with SeeYou can make a report in the event of (a suspected) violation of SeeYou's integrity policy. Which option is used depends on the person about whom the report is made and the relationship the person concerned has with SeeYou.

## **Different channels**

A (suspected) violation can be reported to different channels in different ways. Below is a description, a clear summary and overview is included in Annex 1.

## **A. Internal complaints**

- Employees may report violations directly to the director. This can be done verbally or in writing, explicitly stating that it is a report of integrity violation;
- If the report concerns the director herself, or she does not follow up the report, employees can approach the chairman of the SB;
- Due to the size of the organisation, SeeYou does not have an internal confidant, but an integrity officer. SeeYou has an external confidant, where employees can seek advice regarding all integrity issues.

## **B. External complaints**

- All parties involved in SeeYou can report a (suspected) integrity violation to the integrity officer and/or the director.
- If the reporter feels that the complaint has not been sufficiently resolved by the integrity officer and/or director, there is the option of escalation to the Supervisory Board.
- There is also the option of reporting outside the organisation, to a whistleblower reporting channel. SeeYou has joined Prisma's reporting channel. Involved parties can report (suspected) work-related abuses here if other SeeYou procedures do not or insufficiently lead to a solution and/or reports are not properly handled by SeeYou. Reports are only considered if the complainant can demonstrate that all necessary steps (as included in the integrity policy) have been taken towards SeeYou.

## **Preliminary investigation in case of notification**

When a report enters the reporting system, it is registered by the integrity officer, and directly reported to the director. The director and integrity officer assess whether the report is indeed an integrity violation, or whether further investigation or other follow-up is needed. This assessment takes into account what the allegation is and what evidence is provided for the allegation. It also immediately considers how SeeYou can support and protect the (suspected) victim in the investigation. The director informs the SB at this stage.

## **Research**

If, after assessing the report, it appears that further investigation is necessary, the integrity officer advises the director whether this should be investigated internally or externally. This advice should include how to deal with those involved, specifically the

victim.

The severity and extent of the violation also determine the choice of an internal or external investigation and the advice on how to deal with the person(s) involved. The welfare of the (suspected) victim and those involved is central to the investigation. In addition, confidentiality is paramount. The investigator always listens to what the accused has to say on this.

Based on the results of the investigation, it is determined whether the accusation is justified and what has been reported qualifies as an integrity violation. If it is concluded that there has been a violation, a sanction will be formulated. Where appropriate, the knowledge and contacts present within the sector and the organisation's own network can be used for the investigation. There is also the possibility of a second opinion by a third party.

### **Sanctions**

In case of violation of the code of conduct, SeeYou will take appropriate disciplinary measures. Depending on (the position of) the person involved, the director or the Supervisory Board is authorised to take disciplinary measures. The director or Supervisory Board may seek (external) legal advice prior to a decision. Possible measures are as follows:

- Reporting (in case of criminal acts);
- Official warning or reprimand;
- Suspension (temporary suspension);
- Dismissal;
- Termination of collaborative relationship (in any form).

## 6. Awareness and continued learning

The integrity policy and related system provide a good basis for preventing integrity violations and for anticipating if a violation nevertheless occurs. Having said that, it remains necessary not to rely solely on the efficacy of the policy and system. To stay focused on the issue of integrity, we must continue to raise awareness and constantly learn from situations that arise. In this way, acting with integrity remains, and increasingly becomes, part of who we are.

### Internal organisation

SeeYou implements awareness and learning internally in the following way:

- SeeYou organises at least twice a year a moment in which attention is paid to a part of the integrity policy with the team. A Moral Deliberation takes place once a year.
- SeeYou encourages employees to participate in external meetings on this topic.
- SeeYou this annually on the agenda of the SB meeting.
- Everyone who travels for SeeYou reads the code of conduct before his trip.
- Currently, the integrity officer is looking at how training on integrity can become a regular part of the onboarding of new colleagues.

### Implementation partners

- Integrity is discussed annually with implementation partners during working visits;
- An integral part of the due diligence is checking the implementation partner's integrity policy, this is done prior to entering into a partnership.
- Integrity policies and related procedures are also checked during audits of our implementation partners.
- SeeYou sends along its integrity policy, a summary of the code of conduct and overview of the reporting system (see annex 3) with each contract (at least once a year). This is with the aim to inform and remind the implementation partner of the quality standards that SeeYou sets in terms of integrity.

# 7. Roles and responsibilities

The proper functioning of the integrity system requires that it is clear who has what role and that the associated responsibilities are clear:

## **All concerned with SeeYou**

All employees, members of the Supervisory Board, interns, volunteers, ambassadors, consultants and other representatives of SeeYou comply with the code of conduct and act in line with SeeYou's code of conduct and core values in unforeseen situations. They report (suspected) transgressive behaviour within the chain of work within which SeeYou operates.

## **Director**

The director is ultimately responsible for implementing, safeguarding and complying with the integrity policy. Employees can report (suspected) violations directly to the managing director. Together with the integrity officer, she is responsible for minimising the consequences of unethical actions by those involved, ensures that there are sufficient channels to report unethical actions and takes (disciplinary) measures in case of unethical actions by those involved.

## **Integrity officer**

The integrity officer informs those involved about the integrity policy and related procedures and guidelines and access to reporting points for transgressive behaviour. She ensures implementation, execution and enforcement of the integrity policy and related guidelines and procedures. She also advises the managing director on the steps/measures to be taken in certain situations. She registers internal and external reports, and communicates on the reports to the director.

Together with the director, she is responsible for minimising the consequences of non-integrity by those involved, ensuring that there are sufficient channels to report non-integrity and taking (disciplinary) action in the event of transgressive behaviour by those involved.

In addition, the integrity officer checks and reports whether requirements set by certifying parties are met in the work and collaborations, whether set requirements are included in the procedures, whether the right form of enforcement/evaluation takes place and whether there is assurance of required policies, processes and procedures.

### **Finance & Control Manager**

The Finance & Control Manager is responsible for quality assurance and meeting donor requirements by Southern implementation partners. She is also responsible for internal control within SeeYou.

The Finance & Control Manager also checks and reports whether requirements set by certifying parties are met in the work and collaborations that are entered into, whether set requirements are included in the procedures, whether the correct form of enforcement/evaluation takes place and whether there is assurance of required policies, processes and procedures

### **Supervisory Board**

The SB has a supervisory role in the implementation of the overall policy, including the integrity policy. Each member of the Board and the director is personally responsible for acting with integrity. The chair of the Supervisory Board ensures that the managing director and the members of the Board act with integrity by putting this topic on the agenda and promoting a culture of openness and integrity.

The chairperson takes appropriate action in the event of a breach of integrity by the managing director and members of the Supervisory Board.

### **External confidant**

Point of contact for issues relating to undesirable behaviour at work and all other integrity issues. The confidant offers support and advice and looks together with the reporter at possible solutions to the undesirable behaviour and violation of the code of conduct. The confidant checks and informs about possible solutions, referral possibilities to experts and supports the reporter if he wants to make a report according to the internal reporting system.

### **External whistle-blowing body**

Point of contact for registration of reports, handling of whistleblower reports.

See Annex 1 for the list of reporting channels and contact details.

## 8. Accountability and communication

SeeYou has a sound integrity system which is well maintained. We strive to communicate clearly on integrity and take responsibility and action where necessary. There is communication and accountability on the issue of integrity at different levels:

### **Internal and external**

On the Dutch and English websites, SeeYou publishes its integrity policy, which also clearly states how those involved can report an integrity violation.

### **Communication at the moment of a notification**

Depending on the nature and seriousness of the report, clear and unequivocal communication, both internally and externally, is necessary. In the case of transgressive behaviour, external accountability will be ensured if SeeYou as an organisation has had an impact through employees or volunteers or through the provision of financial resources. There will also be external accountability if public opinion holds SeeYou responsible for the transgressive behaviour. The focus is on explaining how things were done at the time of the report and how such a violation will be prevented in the future.

### **CBF notification requirement**

In case of (suspected) serious malpractice, SeeYou has an explicit reporting obligation to the CBF. Where appropriate, the CBF, as supervisory body, will review the organisation's integrity system to determine whether adequate action has been taken and transparent accountability is in place. If necessary, improvement agreements will be made.

### **Annual report**

The annual report addresses the organisation's integrity in an open and transparent manner. It discusses the structure of the organisation's integrity system, roles and responsibilities, the number and nature of integrity reports and their handling. There is also room for reflection on the integrity policy pursued, risks of integrity violation and lessons learned.

### **External audits and monitoring**

During external audits and checks, such as for the CBF and ISO 9001 seal of approval, the integrity policy is discussed and vetted. Feedback to improve the integrity policy and/or procedures will be applied.

## Annex 1 - Overview of reporting channels

Overview of channels for reporting (suspected) integrity violations			
Reporting channels	Purpose of reporting channel	This reporting channels is for:	Address for notification:
<b>Internal complaints - Managing director and/or external confidant</b>	<p>Employees can report violations directly to the director or contact the external confidant. This concerns complaints about, among other things, integrity and violation of the code of conduct, the organisation's identity, unclear or unfair decision-making or decision-making against established policy, working methods that go against established policy. This can be done verbally or in writing, <u>explicitly stating that it concerns a report of violation of integrity.</u></p> <p>If the report concerns the director herself, or she does not follow up the report, employees can approach the chairman of the SB.</p> <p>SeeYou has an external confidant, where employees can seek advice regarding integrity issues.</p>	Employees of SeeYou	<p>Director reporting channel: Jolanda Omvlee <a href="mailto:j.omvlee@seeyoufoundation.nl">j.omvlee@seeyoufoundation.nl</a> +31 85 044 1701 / +31 (0)646756832</p> <p>External Confidant Gladys Mekking and Nathalie van Duren. Phone: 085 060 30 44. If you cannot reach us directly, please leave a voicemail message, send a WhatsApp message or email us at <a href="mailto:vertrouwenspersoon@externevp.com">vertrouwenspersoon@externevp.com</a></p>
<b>External complaints - Integrity officer and/or Director</b>	<p>All parties involved in SeeYou can report a (suspected) integrity violation to the integrity officer and/or the director. <u>Reports should explicitly state that it is a report of integrity violation.</u> It concerns complaints about, among other things, integrity and violation of the code of conduct, the identity of the organisation, unclear or unfair decision-making or decision-making against established policy, working methods that go against established policy.</p> <p>If the reporter feels that the complaint has not been sufficiently resolved by the integrity officer and/or director,</p>	All involved with SeeYou	<p>Integrity officer reporting channel: Niska Stoker <a href="mailto:complaints@seeyoufoundation.nl">complaints@seeyoufoundation.nl</a> / <a href="mailto:n.stoker@seeyoufoundation.nl">n.stoker@seeyoufoundation.nl</a> +31 85 044 1718</p> <p>Director reporting channel: Jolanda Omvlee <a href="mailto:j.omvlee@seeyoufoundation.nl">j.omvlee@seeyoufoundation.nl</a> +31 85 044 1701 / +31 (0)646756832</p>

	<p>there is the option of escalation to the Supervisory Board.</p> <p>If the complaint concerns the integrity officer, it is reported to the director. If the complaint concerns the director, it is reported to the chairman of the SB. If the complaint concerns the chairman, she seeks advice from the external confidant.</p>		
<b>Supervisory Board</b>	<p>If the complaint concerns a member of the Supervisory Board, it will be reported to the director. She will report it directly to the chairman. If the complaint concerns the chairman, she will seek advice from the external confidant .</p> <p>Employees may also approach the confidant and chairman directly in case the complaint concerns a member of the Supervisory Board.</p> <p>Members of the Supervisory Board report complaints about fellow Supervisory Board members to the chairman. If the integrity violation concerns the chairman, advice is sought from the external confidant.</p>	Employees and members of SeeYou Supervisory Board	Reporting Board: Sander van Bellen (chairman) <a href="mailto:sandervanbellen@gmail.com">sandervanbellen@gmail.com</a> , +31 (0)618490098
<b>External trustee: External VP</b>	<p>Point of contact for issues relating to undesirable behaviour at work. Reception, support and advice and looking together at possible solutions for the reporter of undesirable behaviour.</p> <p>Support when an integrity violation is suspected, such as fraud, theft, corruption or conflict of interest.</p> <p>Review and inform about possible solutions, make referrals to experts and guide the reporter if they want to make a report according to the internal reporting system.</p>	Employees and members of SeeYou Supervisory Board	External VP Gladys Mekking and Nathalie van Duren.  Phone: 085 060 30 44. If you cannot reach us directly, please leave a voicemail message, send a WhatsApp message or email us at <a href="mailto:vertrouwenspersoon@externevp.com">vertrouwenspersoon@externevp.com</a>

<b>External whistleblowing body</b>	<p>There is the option of reporting outside the organisation, to a whistleblower reporting channel. SeeYou has joined Prisma's reporting channel. Involved parties can report (suspected) work-related abuses here if other SeeYou procedures do not or insufficiently lead to a solution and/or reports are not properly handled by SeeYou. Reports are only considered if the complainant can demonstrate that all necessary steps (as included in the integrity policy) have been taken towards SeeYou.</p>	<p>All stakeholders who come into contact with (suspected) abuse in the course of their work for SeeYou</p>	<p><a href="mailto:klachtencommissie@prismaweb.org">klachtencommissie@prismaweb.org</a></p>
<b>Notifications regarding AVG</b>	<p>For questions or complaints about data processing, please contact the data protection contact person.</p> <p>If the data subject is not satisfied with the handling, a complaint can be filed with the Personal Data Authority at <a href="http://www.autoriteitpersoonsgegevens.nl">www.autoriteitpersoonsgegevens.nl</a>.</p>	<p>All concerned with SeeYou</p>	<p>Arjen van Veldhuisen,  <a href="mailto:a.vanveldhuisen@seeyoufoundation.nl">a.vanveldhuisen@seeyoufoundation.nl</a>  (+31) 85 044 1704.</p>

## Annex 2 - Overview of steps reporting system for external stakeholders at SeeYou

<u>Person reporting the incident</u>	You hear or see an incident that may be a violation of the integrity policy.		
	You write down what you have heard/seen		
	You will share this report as soon as possible (preferably within 24 hours) with the <b>Integrity Officer</b> , Niska Stoker ( <a href="mailto:complaints@seeyoufoundation.nl">complaints@seeyoufoundation.nl</a> ). If the complaint concerns the integrity officer, reports can be made to the director, Jolanda Omvlee ( <a href="mailto:j.omvlee@seeyoufoundation.nl">j.omvlee@seeyoufoundation.nl</a> ).		
<u>Director and/or integrity officer SeeYou</u>	The director and the integrity officer take the next steps, first deciding together with the alleged data subject/victim on the appropriate next steps. Does the allegation or concern relate to any of the following categories: <u>Category 1</u> - an employee or representative of SeeYou <u>Category 2</u> - a staff member of an implementation partner of SeeYou <u>Category 3</u> - an abuse concern in the community, not involving employees of SeeYou nor a partner		
	<b>Category 1</b>	<b>Category 2</b>	<b>Category 3</b>
	SeeYou has the responsibility to investigate.	SeeYou has a shared responsibility and will ask the relevant implementation partners to investigate.	SeeYou or the partner has no formal responsibility to conduct research, but may use their role in the community to influence the situation.
	Initiate internal procedures and appoint an investigation officer.	Ask the implementing partner to initiate an investigation process and to share the final report.	SeeYou will not investigate this matter. After considering whether there is a role for SeeYou, and if this is in the best interests of the person concerned/victim, SeeYou may pass this information on to the local authorities or partner, or SeeYou may decide not to take further action.
	Consider appropriate action, this may include suspension from work and disciplinary action.	Review the implementing partner's final report and the actions taken.	
	If there is evidence of a criminal offence – this will be reported to the authorities.	If SeeYou is not satisfied with the report and/or handling, this may affect the working relationship with the implementing partner and may lead to ending the collaboration.	Follow-up on any actions taken by the authorities.
		SeeYou has internal processes in place to learn from the incident and reflect on improving policies or procedures.	

## **Annex 3 -SeeYou poster - Code of Conduct and Reporting Mechanism**

### **SeeYou's Code of Conduct**

SeeYou considers every person as precious and valuable. It affects us that people with disabilities are often not seen and are excluded from society. That is why we are committed to providing access to (eye) care, education and work in Africa and Asia. Our core values dictate that this work must be carried out with integrity. SeeYou aims to empower and support vulnerable individuals, often at greater risk of abuse due to their disabilities. Therefore, it is crucial to act with integrity and ensure that the financial resources SeeYou receives are used responsibly.

We expect all stakeholders (e.g. staff, volunteers, partner organisations, consultants) to abide by our Code of Conduct and to act in line with our core values:

- Every person is precious and valuable
- There is room for everyone
- Charity and justice go hand in hand

### **Code of Conduct of SeeYou's partner organisations**

In addition to our own Code of Conduct, we expect our partner organisations to have their own integrity policy and to act accordingly. Partner organisations are also questioned by SeeYou Foundation on their own Code of Conduct and integrity policy, which includes the prevention of fraud and corruption, the prevention of sexual exploitation, abuse and harassment (PSEAH), and child protection. Additionally, partner organisations have a complaint reporting mechanism in place that welcome and address complaints from beneficiaries and other external stakeholders, as well as grievances from staff.

### **SeeYou's Code of Conduct commitments**

All SeeYou's stakeholders (staff, volunteers, partner organisations, consultants) commit to the following statements:

1. I act, as a professional and also personally, in accordance with the core values of SeeYou.
2. I respect everyone's dignity and treat everyone equally, based on the core value that every human being is precious and valuable.
3. I work responsibly with the (financial) resources and information entrusted to me as part of my work with SeeYou.
4. I share responsibility for the welfare of everyone involved in the work of SeeYou, and the proper functioning of the integrity system of the organisation.

## Reporting to SeeYou

Person reporting the incident	You hear or see an incident that may be a violation of the integrity policy.		
	You write down what you have heard/seen		
Director and/or integrity officer SeeYou	You will share this report as soon as possible (preferably within 24 hours) with the Integrity Officer, Niska Stoker ( <a href="mailto:complaints@seeyoufoundation.nl">complaints@seeyoufoundation.nl</a> ).		
	If the complaint concerns the integrity officer, reports can be made to the director, Jolanda Omvlee ( <a href="mailto:j.omvlee@seeyoufoundation.nl">j.omvlee@seeyoufoundation.nl</a> ).		
	The director and the integrity officer take the next steps, first deciding together with the alleged data subject/victim on the appropriate next steps.		
	Does the allegation or concern relate to any of the following categories:		
	<u>Category 1</u> - an employee or representative of SeeYou		
	<u>Category 2</u> - a staff member of an implementation partner of SeeYou		
	<u>Category 3</u> - an abuse concern in the community, not involving employees of SeeYou nor a partner		
	<b>Category 1</b>	<b>Category 2</b>	<b>Category 3</b>
	SeeYou has the responsibility to investigate.	SeeYou has a shared responsibility and will ask the relevant implementation partners to investigate.	SeeYou or the partner has no formal responsibility to conduct research, but may use their role in the community to influence the situation.
	Initiate internal procedures and appoint an investigation officer.	Ask the implementing partner to initiate an investigation process and to share the final report.	SeeYou will not investigate this matter. After considering whether there is a role for SeeYou, and if this is in the best interests of the person concerned/victim, SeeYou may pass this information on to the local authorities or partner, or SeeYou may decide not to take further action.
	Consider appropriate action, this may include suspension from work and disciplinary action.	Review the implementing partner's final report and the actions taken.	
	If there is evidence of a criminal offence – this will be reported to the authorities.	If SeeYou is not satisfied with the report and/or handling, this may affect the working relationship with the implementing partner and may lead to ending the collaboration.	Follow-up on any actions taken by the authorities.
SeeYou has internal processes in place to learn from the incident and reflect on improving policies or procedures.			

## **Retaliation policy**

SeeYou will not tolerate retaliation against anyone who, in good faith, reports a concern or cooperates in an investigation, even if the allegation is not substantiated. If you feel that you or any of your colleagues are being retaliated against, report it immediately.

## Annex 4 – Child protection code of conduct

### Code of conduct for the protection of children

- **Never try to be alone with a child.** If it is necessary, make sure others can see or hear what you are doing. This also applies to home visits, transporting a child in your car or taxi, and when a child comes to your home.
- **Only help children with washing or going to the toilet if it is really necessary.** This only applies to young children or children who cannot do it themselves. Make sure another adult is nearby.
- **Teach or inform children in an open environment.** Make sure other adults can access the space.
- **Do not touch children in an inappropriate way.** No hugging or touching that could be misconstrued. Also, do not play rough or ticklish games.
- **Do not favour a child.** Treat all children fairly.
- **Do not use physical punishment.** Always discuss disciplinary matters with a colleague or supervisor.
- **Do not let children do domestic work.** Children should only do small chores, as long as this does not harm their health or development, or interfere with their school and leisure time. Always follow the rules on compulsory education and child labour.
- **Adhere to national and international children's rights** and laws that protect children.

### How do we talk to children?

- ✓ **Treat children with respect.** Make them feel safe and happy.
- ✓ **Do not use harsh or hurtful words.** Do not scold or threaten a child.
- ✓ **Talk in a way that children understand.** Use simple, friendly language.

### What if a child is being abused or you see something suspicious?

- ✓ Report it immediately at [complaints@seeyoufoundation.nl](mailto:complaints@seeyoufoundation.nl) . This is picked up by the integrity officer. Together with experts, they look for the best solution for the child.

- ✓ All reports remain confidential. This means that we handle the information carefully and ensure that the child is not identifiable.

I, \_\_\_\_\_, have read these rules and promise to abide by them.

Signature:

Date:

Location:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## Annex 5 – Partos-9001 standard

SeeYou is certified for Partos-9001, the sector-specific standard based on ISO 9001. The accompanying Code of Conduct of Partos reflects the standards and values endorsed by SeeYou, as a member of Partos, as the basis for its actions, including in the area of integrity. The provisions below (left column) apply from August 2023. The right-hand column indicates the extent to which the standards are currently met.

Partos standard provisions	The extent to which the Partos standard is met
<p><b>7. Well-functioning integrity system</b></p>	
<p>Presence of code of conduct describing the organisation's explicit norms and values. The code of conduct addresses areas of concern around integrity, makes clear what constitutes inadmissible behaviour and makes clear how potential victims are protected and receive proper care. The code of conduct is published on the website in an easily findable way.</p>	<p>The code of conduct, which contains the required elements, has been documented and published on SeeYou's website.</p>
<p>Devote attention through the integrity system to the focus areas of abuse of power, financial violations and interpersonal violations.</p>	<p>The aforementioned areas of concern are addressed in the code of conduct, internal procedures/directive and policy documents.</p>
<p>Translate the code of conduct into guidelines for acting with integrity for parties and individuals working on behalf of the organisation (e.g. suppliers for services, partner organisations).</p>	<p>The code of conduct is shared with all parties and signed by all persons working on behalf of the organisation.</p>
<p>Have a director who is ultimately responsible for integrity and a member of the Supervisory Board who oversees this.</p>	<p>The director is ultimately responsible for integrity within the organisation. The chairman of the Supervisory Board oversees this.</p>
<p>Have one or more employees who undertake policy-making, advisory and executive work on integrity and are equipped to do so.</p>	<p>The responsibility for this lies with integrity officer. Due to the size of the organisation, when policy-making and advice is required (if necessary), expertise is requested from the external confidant</p>

	or fellow organisation (with whom an agreement on this has been made).
<p>Have the following for reporting violations:</p> <ul style="list-style-type: none"> <li>• A reporting channel where violations can be reported in a approachable, safe and confidential manner by employees, volunteers and others for and with whom the organisation works.</li> <li>• One or more confidants</li> <li>• Affiliation with an external whistleblowing body</li> </ul>	<p>Those involved in SeeYou can report violations in various ways, see Annex 1 of the integrity policy.</p> <p>There is an external confidant, and SeeYou has joined the Prisma whistleblower scheme.</p>
<p>Have capacity and expertise available or hire it to:</p> <ul style="list-style-type: none"> <li>• Investigate reports</li> <li>• Advise on proportionate sanction measures, including legal action</li> <li>• Advise on proportionate assistance or compensation to victims and injured parties</li> <li>• Decide on and implement measures</li> <li>• Advise on appropriate communication of any violations</li> </ul>	<p>If serious issues arise, SeeYou can call on expertise available at Woord en Daad and on Partos. If necessary, SeeYou can hire external expertise.</p>
<ul style="list-style-type: none"> <li>• Ensure that the guidelines and reporting procedures are known to the target group, staff, volunteers and persons working at (or on behalf of) the organisation.</li> </ul>	<p>This is part of HR procedures and the integrity officer is responsible for its implementation.</p>
<ul style="list-style-type: none"> <li>• Identify integrity risks on all relevant topics with appropriate regularity</li> </ul>	<p>This is done through the risk management table, which is reviewed annually.</p>
<ul style="list-style-type: none"> <li>• Have a moral learning process, i.e. ensure regular moral reflection on difficult moral issues with and by staff members</li> </ul>	<p>The integrity policy describes how SeeYou shapes and interprets this towards various stakeholders.</p>

<ul style="list-style-type: none"><li>• Devote attention to organisational integrity in the annual report, and this section includes at least information on:<ul style="list-style-type: none"><li>○ The manner of implementation is described in the integrity policy.</li><li>○ The number and nature of reports of violations and their handling.</li><li>○ A reflection on its own integrity policy.</li></ul></li></ul>	Part of SeeYou's regular annual report format.
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## Annex 6 – Prisma Complaints Procedure (Whistleblowing procedure)



including  
everybody

Prisma



# Complaints procedure Prisma

[www.seeyoufoundation.nl](http://www.seeyoufoundation.nl)

Complaints procedure SeeYou | 1

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# Foreword

SeeYou wants to treat all its internal and external relations with care. Nevertheless, it remains human work. Mistakes can therefore be made (unintentionally). To remedy these mistakes as well as possible, SeeYou has a complaints procedure. This document tells you how and where you can submit a complaint and how your complaint will be handled.

This complaints procedure is intended for internal and external relations. SeeYou considers it very important that complaints can be brought forward. Of course, the complainant can always talk to the manager, the director or one of the board members. If this is not possible, the complainant can contact the confidential advisor or file a complaint with the complaints committee. This does not alter the fact that in all cases the complainant has the option of reporting to another appropriate body, such as the Labour Inspectorate or civil, administrative and/or criminal courts.

# 1. General provisions

## Article 1: definitions

For the purposes of these regulations, the following definitions shall apply:

1. **Complainant:** a person or authority making use or having made use of the service of SeeYou or otherwise having been in contact or contacted SeeYou. The complainant may also be a legal representative, authorized representatives or next of kin. Co-workers cannot make use of these complaints regulations.
2. **Complaint:** each expression of dissatisfaction by a complainant with the performance of (a co-worker of) SeeYou, uttered by complainant. The dissatisfaction may relate to actions and decisions or the failure to do so in respect of the complainant.
3. **The accused:** every co-worker of SeeYou or SeeYou themselves about whom a complaint has been filed.
4. **SeeYou:** By SeeYou we mean: All employees associated with SeeYou.
5. **Co-worker:** a person (paid or unpaid, trainee or else), working for SeeYou.
6. **Complaint handling:** the procedure in which the Complaints committee finally gives an opinion or comes to a decision on the merits of the complaint or on the complaint handled, whether or not accompanied by recommendation(s).
7. **Complaint mediation:** intervention aimed at resolving the problem which caused the dissatisfaction of the complainant.
8. **Complaints Committee:** Committee established by Prisma regarding these complaints regulations.
9. **Prisma:** is an association of Christian organisations active worldwide in development cooperation and diaconate. SeeYou is one of the members of Prisma.

## Article 2: Objectives

The objectives of these regulations are:

1. Taking the complainant seriously by having the complaint independently

assessed.

2. Restoring the relation of trust between SeeYou and the complainant.
3. Improving the quality of functioning of SeeYou.

### **Article 3: Confidentiality**

1. Anyone who, in the context of these regulations, receives information whose confidential nature he/she knows or should reasonably suspect, shall be bound to secrecy, subject to legal requirements
2. The complaints committee, or the in article 4.1 mentioned confidential adviser, or the in article 4.3 mentioned complaints mediator, will communicate under article 3.1 the duty to confidentiality to the complainant and the accused, prior to the complaint handling or mediation of the complaint.

### **Article 4: Complaints mediation**

1. There is no need to immediately take care of a complaint, lodged by the complainant, by the Complaints Committee. The complainant may first turn to the confidential advisor of SeeYou with his notification.
2. The confidential adviser, together with the complainant draws up an inventory of the situation, stands beside the complainant and tries, together with the complainant, to reach a workable solution.
3. If mediation is necessary, the confidential advisor, in consultation with the complainant, will seek a suitable mediator. The confidential advisor does not himself mediate. In mediation (as opposed to filing a complaint) no investigation takes place and no judgement is made about the plausibility of the content of the report. It is aimed to stop undesirable behaviour. The method of mediation may vary per situation. During mediation it is being discussed which behaviour is perceived as undesirable, and that behavioural change is expected in future.
4. If the mediation attempt is not successful, or the complainant is not satisfied with the outcome of de mediation procedure as under article 4.3, the complaint can still be submitted to the Complaints Committee.

5. The complainant may also apply directly to the Complaints Committee. If the Complaints Committee believes that mediation is still possible, it may ask if the complainant is willing to do so. That decision is up to the complainant.

# 2. The complaints committee

## Article 5: Composition and establishment

1. The complaints committee consists of three people and three deputy-members.
2. The composition is as follows:
3. An independent chairman and two members, who are not administratively involved, and/or may be employed by Prisma, or any of its affiliated members.
4. The members are appointed by the chairman of Prisma, in consultation with the Prisma Board. Prisma provides secretarial support of the complaints committee.
5. The members of the complaints committee are appointed for a period of four years, after which they may be re-appointed once.
6. The members of the committee have a duty of confidentiality.

## Article 6: Challenge and apology

1. The complainant may object to participation of dealing with the complaint (challenge) by one (or more) member(s) of the complaints committee, if it appears that regarding that member or circumstances, forming an impartial opinion regarding the complaint, would be difficult.
2. The other members of the complaints committee decide whether the objection is valid. In case of a tie it is decided that objection is valid. This decision is communicated in writing to the complainant and the accused.
3. One or more member(s) of the complaints committee may abstain from handling a complaint (excusing him/her) if facts or circumstances arise in relation to that member, which would make it difficult to form an impartial opinion of the complainant. He/she is obliged to do so, if remaining members of the complaints committee, taking part in the handling of the complaint, consider that the aforementioned facts or circumstances arise with regard to him/her.
4. In the event of a justified challenge or apology the member involved shall be replaced.

## **Article 7: Without charge or consultation**

1. The members of the complaints committee take part in the complaint handling process without charge or consultation.

## **Article 8: Termination of membership**

1. Membership of complaints committee is terminated:
  - a. When committee member terminates membership;
  - b. When committee member is deceased;
  - c. When period of appointed committee member is expired;
  - d. When committee member (whether or not on request of other committee members) or chairman of Prisma is exempted from his/her function because of:
    - i. Neglect of his/her duty;
    - ii. Other important reasons on account of which maintaining as a
  - e. member cannot be desired;
  - f. By removal of a committee member based on not fulfilling article 3.1 of this regulation;
  - g. When a committee member starts employment with SeeYou (paid, unpaid, as a trainee, or otherwise).

## **Article 9: tasks**

1. After having received complaint, members of the complaints committee look into the case and views thereof of parties.
2. The complaints committee passes on the verdict about the validity of the complaint within the time limit as agreed on in this regulation. She notifies in writing the outcome, to complainant, accused, director and chairman of the Supervisory Board of SeeYou and, explained in detail.
3. With reference to the findings, the complaints committee may advise the director and chairman of the Supervisory Board of SeeYou. They may signalize structural shortcomings in the service of the organization of SeeYou.

4. The complaints committee takes care of well registering of lodged complaints.

### **Article 10: Authority**

1. The complaints committee has, in executing her duties, the following authority:
  - a. Summoning and hearing of complainant and accused.
  - b. Summoning and hearing of other persons related to the filed complaint.
  - c. Obtaining information and inspecting documents, following the consent of the complainant and the accused and in compliance with legal provisions.
2. The complaints committee judges the complaint and she may advise about what actions to take.
3. The complaints committee may come to the conclusion, that she is not authorized regarding the lodged complaint. In that case the complaints committee has to refer to an authority who – in its opinion – is authorized in this case.

# 3. The complaint

## Article 11: submission

1. The complaint shall be submitted in writing to the Grievance Committee. The complaint should state at least:
  - 1.1 The name of the complainant.
  - 1.2. Possibly the name of his/her legal representative, agent or next of kin.
  - 1.3. The name of the accused.
  - 1.4. The reason for the complaint.
  - 1.5. The date or dates on which the facts from which the complaint arose took place.
2. The complainant may receive assistance in putting the complaint in writing. Such assistance may be provided by the confidential adviser.
3. Both complainant and accused have the right to be assisted.

## article 12: admissibility

1. The complainant's complaint is admissible if it relates to events that took place after the entry into force of these complaints regulations.
2. Anonymous complaints are not considered. However, they are recorded to serve as a guide for improving service quality.
3. The complainant's complaint is inadmissible if a decision has already been made by the Complaints Committee on this complaint, unless new facts have arisen.
4. The complainant's complaint is also admissible if the person charged is no longer employed by or on behalf of SeeYou.

# 4. The procedure

## article 13: handling of the complaint

1. The handling of the complaint, which the complainant may send by e-mail to [klachtencommissie@prisma.org](mailto:klachtencommissie@prisma.org), will be carried out by at least three members of the Complaints Committee.
2. The Complaints Committee will send an acknowledgement of receipt of the complaint to the complainant within five working days. This acknowledgement of receipt will inform the complainant of the procedure and the time of consideration.
3. If, in the opinion of the Complaints Committee, a complaint does not contain sufficient information, it will give the complainant the opportunity to provide additional information within four weeks.
4. The Complaints Committee ensures that the accused is informed of the content of the complaint filed against him or her and the procedure to be followed within two weeks of receiving the (additional) complaint.
5. The Complaints Committee requests the accused to respond to the content of the (additional) complaint within three weeks.
6. The complainant has the opportunity to respond to this within two weeks.
7. The accused will have the last chance to respond within two weeks.
8. If the Complaints Committee deems it necessary or if one of the parties so requests, the parties will be heard separately. The Complaints Committee may only include any resulting information in its assessment if the other party has been given the opportunity to respond.
9. The Complaints Committee has the power to summon and hear witnesses. It does so at a time when both parties still have the opportunity to defend themselves.
10. If the Complaints Committee considers that it has all the necessary information, it will allow an oral hearing of the complaint to take place. The parties may indicate if they do not wish to be jointly present at the oral hearing. In addition, they may request that the complaint be dealt with in writing.
11. The Complaints Committee shall ensure that both parties can take full and timely notice of all submissions and statements.
12. If the Complaints Committee considers that it has enough information about the complaint, it may reach a decision. It may also issue the ruling in writing if it considers that an oral hearing is not necessary.
13. Sessions of the Complaints Committee are not open to the public.
14. The Complaints Committee does not take a passive stance.

# 5. The ruling

## article 14: ruling

1. If possible, the Complaints Committee will decide on the merits of the complaint and on the measures to be imposed or taken within six weeks of receiving the complaint, but at the latest within three months. The decision on the merits of the complaint is binding. The chairman of the complaints committee shall notify the parties concerned if the three-month period is deviated from.
2. The Complaints Committee decides by majority vote.
3. The Complaints Committee must give proper reasons for its decision.
4. The Complaints Committee sends its decision to the complainant, the accused and the director and the chairman of the Supervisory Board of SeeYou within one week from the date of the decision.
5. In urgent cases, the chairman of the Complaints Committee makes a provisional ruling, after which the complaint is considered in the standard procedure.

## article 15: consequences of the ruling

1. The director and the chairman of the Supervisory Board of SeeYou shall notify the complainant and the Complaints Committee in writing within one month of receiving the Complaints Committee's opinion as to whether he will take measures as a result of that opinion and, if so, what these are. If this period is deviated from, the director and the chairman of the Supervisory Board of SeeYou will notify the complainant and the Complaints Committee, stating the period within which the director and the chairman of the Supervisory Board of SeeYou will make their views known to them.
2. Deviation from the advice or recommendation of the Complaints Committee on the measures to be taken must be duly justified by the director and the chairman of the Supervisory Board of SeeYou.
3. In all cases, the complainant retains the option of also turning to another appropriate body, such as Labour Inspectorate or civil, administrative and/or criminal courts.

# 6. Report

## Article 16: registration

1. The Complaints Committee will ensure registration of complaints submitted to it. It will also register anonymous complaints.
2. A file will be kept on the handling of the complaint. The file contains all documents relating to the complaint, including the date of entry, confirmation of receipt and settlement, the person handling the complaint and the outcome of the settlement.
3. The records shall be kept in such a way that the privacy of those involved is guaranteed. The file shall be confidential.
4. The Complainant and the Accused have the right to inspect the file. They will submit a written request to this end to the Complaints Committee. Unless inspection is refused, inspection must take place within one month after submission of the request. Inspection may only be refused if inspection would cause disproportionate harm to one of the parties or a third party. The applicant shall be informed of such refusal in writing, stating the reasons.
5. Records and files shall be kept in the archives for five years, unless the complainant requests their destruction earlier. The records shall not be accessible to unauthorised persons. After the expiry of five years, the records shall be destroyed.
6. Further rules regarding the processing of personal data are laid down in a separate privacy statement that will be sent to the Complainant and the Accused upon written request.
7. Notifications - these are complaints for which the Complainant only wishes registration and no further action - and complaints that are withdrawn during the treatment will also be registered.

## article 17: annual report

1. The Complaints Committee prepares an annual report based on the records in which it reports to SeeYou on its work in handling complaints in the preceding calendar year, unless the Complaints Committee did not handle any complaints. The data is anonymized and the report is public.

# 7. Final provisions

## article 18: costs

1. For the procedure of handling a complaint by the Complaints Committee, no fees will be charged to the complainant and the accused.
2. If the complaint is declared manifestly well-founded by the Complaints Committee, the complainant may receive a refund of some expenses incurred by the complainant in connection with the complaint procedure. These may include travel expenses and copies or postage of documents.
3. The cost of calling a witness, or a representative, or someone to assist you will be borne by the person who calls them.
4. To be eligible for compensation, the complainant shall submit a reasoned request to the Complaints Committee.

## article 19: facilities for the complaints committee

1. The director of Prisma shall provide the necessary facilities and resources for the proper functioning of the Complaints Committee.
2. The director of Prisma appoints an Official Secretary. The Official Secretary provides administrative support to the Complaints Committee. For example, he or she is responsible for the timely announcement of meetings, the distribution of documents to committee members, complainant and accused, the registration referred to in Article 16 and the annual report referred to in Article 17.
3. Members of the Complaints Committee receive an expense allowance from the director of Prisma.

## article 20: power to amend

1. The director of Prisma shall provide the necessary facilities and resources for the proper functioning of the Complaints Committee.
2. The director of Prisma appoints an Official Secretary. The Official Secretary provides administrative support to the Complaints Committee. For example, he or she is responsible for the timely announcement of meetings, the distribution of documents to committee

members, complainant and accused, the registration referred to in Article 16 and the annual report referred to in Article 17.

3. Members of the Complaints Committee receive an expense allowance from the director of Prisma.

### **article 21: publication**

1. The director of SeeYou shall ensure that the existence of the complaints regulations is appropriately publicised, both internally and externally.
2. The complaints procedure can be found on SeeYou's website.