

# FAQ

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If you have any questions not addressed in this document, you can contact Cordaid's Integrity Officer via [integrity@cordaid.org](mailto:integrity@cordaid.org)\*.

For more information about Cordaid's integrity system, please visit: <https://www.cordaid.org/en/who-we-are/integrity-and-code-of-conduct/>

\* As of 1 January 2021, Cordaid and ICCO have joined forces. Therefore, where 'Cordaid' is mentioned throughout this document, 'ICCO' is included.



## I. About EthicsPoint

### ■ *What is EthicsPoint?*

EthicsPoint is a reporting tool created by NAVEX Global that allows anyone who has an integrity concern make a report in a safe and accessible way.

### ■ *Why do we need a system like EthicsPoint?*

- Speaking out about integrity concerns can be difficult – you may be afraid of potential consequences, think that the issue is not ‘serious enough’, or you feel that reporting a concern may not be accepted by the people around you. With Cordaid’s EthicsPoint reporting system, you can report your concern even anonymously.
- Next to putting stopping misconduct by Cordaid representatives, reporting will also help Cordaid identify and manage risks and trends, which can be used to strengthen the culture of integrity within the organization.

## II. Reporting – General

### ■ *What types of situations should I report?*

You are encouraged to report any concerns, suspicions, or allegations of integrity breaches as outlined in Cordaid or ICCO’s Code of Conduct and the policies related to Safeguarding, Fraud, Conflict of Interest, Anti-Terrorism and Anti-Money Laundering.

For general complaints regarding Cordaid’s programmes or fundraising, please use the contact form on our website: <https://www.cordaid.org/en/who-we-are/contact/>.

For Cordaid representatives: Where complaints relate exclusively to disagreements or conflicts regarding labor rights, such as contracting, benefits or performance appraisal, the complaint procedure laid out in the [Legal Status Regulations](#) (internal) or local HR Manuals applies. Where complaints or incidents relate exclusively to security, the [security incident reporting procedure](#) (internal) applies.

### ■ *What should I report?*

It is important that you report all relevant information you have. What is particularly useful for investigations is if you are able to provide *concrete* details such as dates, locations, names and job titles of those involved and those affected, any witnesses, etc. If there are unclarities or a report is too vague, we may revert back to you and ask some clarification questions that will help us assess what response is required.

Sensitive information, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and data concerning health or sex life should not be included unless relevant for the case.



■ *If I see an integrity breach, shouldn't I just report it to my manager and let them deal with it?*

If you feel comfortable doing so, you can report an integrity breach via your manager who will then link up with Cordaid's integrity team to ensure appropriate follow up.

We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner, for instance if you have concerns that the case may not be dealt with properly or your manager is implicated in the integrity concern. It is for such circumstances that we have partnered with NAVEX Global. We would rather you report anonymously than keep the information to yourself.

■ *What if I don't have 'proof'?*

While we do ask you to report any concerns, you do not carry the burden of evidence. In other words: it is not your responsibility to provide evidence. In fact, starting your own inquiry may put you or others at risk, and may also jeopardize any future investigation. All you need to do is to report your observations: what you have heard or seen.

■ *Why should I report?*

Allegations of integrity issues should be reported to the organization for two key reasons:

1. To stop the misconduct and for any person affected to receive support
2. To hold Cordaid accountable and to help Cordaid identify and manage risks and trends, which can be used to strengthen the culture of integrity within the organization, e.g. by dismissing staff that doesn't respect Cordaid's integrity standards.

■ *Does management really want me to report?*

We truly do. In fact, we *need* you to report. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact. Cordaid considers integrity reports as vital signals that help the organization fulfil its *Duty of Care* and ensure that we *Do No Harm*.

■ *Can I save the report and finalize later?*

Unfortunately, this is not possible. Reports cannot be saved and submitted later. However, please feel free to click on 'Make a report', and select the type of issue you want to report – this will lead you to the report form, so you see what information is required for when you make a report and prepare accordingly if you need to.

■ *Where do these reports go? Who will see my report?*

Reports are entered directly on the external EthicsPoint secure server. The reports are made available only to specific individuals within Cordaid who are responsible for taking care of the report, based on the type of integrity breach, the severity, and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence. The subject of concern of your report will not be able to access your report.



■ *How do I know if someone has already reported the issue?*

In practice, you will not be able to know if someone has already reported the issue. It is important that you report what you have heard or observed. We will then check if the case is already known and if a response has already started.

Plus: the psychological bystander effect actually shows that the more people witness an issue, the more likely it is that they think someone else will or should take action and get help. However, the result of this can be that many people don't get help even while knowing that something is going on. Thus, it is really up to each individual to speak up and not rely on others to report.

■ *Cordaid's reporting procedures seem too serious or formal for my concern. What should I do?*

We encourage you to report your concern anyhow. You may have initial knowledge of an activity that may point us towards a harmful trend or a hidden bigger integrity issue. And even if our pre-assessment finds that the issue does not actually fall under Cordaid's integrity mandate, we can refer the issue and ensure that the concern is dealt with proportionally. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked.

■ *Can I also make a verbal report?*

Yes, definitely. You can use which ever reporting channel you feel most comfortable with. For instance, Cordaid representatives can make a verbal report to their supervisors. Also, you could directly ask for a call with Cordaid's Integrity Officer via [integrity@cordaid.org](mailto:integrity@cordaid.org). You can find all reporting channels in Cordaid's Integrity [Standard Operating Procedures](#).

■ *What if my concern is about someone other than a Cordaid representative, e.g. about the behaviour about someone in another NGO?*

In principle, we would encourage you to report directly to the organization in question. However, if they don't have a safe and confidential reporting channel, you can use this website to report. If the report does not concern the behaviour of representatives of Cordaid or a partner organization, we will make sure that we refer the report to those responsible for follow up – always keeping in mind confidentiality and your safety.

### III. Reporting – Security & Confidentiality

■ *How can I make an anonymous report?*

In the report form, you will be able to select a tick box to remain anonymous – this will remove the questions about your identity. When submitting the report, you will receive a report key which you can use to anonymously 'log in' to your case file and see if you have received an update on your case or any requests for clarification.

■ *It is my understanding that any report I send from a company computer generates a server log that shows every website that my PC connects with. Won't this log identify me as the report originator?*

NAVEX Global does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available.



If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café or at a friend's house) through the EthicsPoint secure website. Many people choose this option, as NAVEX Global's data shows that fewer than 12% of reports are generated during business hours.

■ *Can I file a report from home and still remain anonymous?*

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained.

■ *I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?*

The EthicsPoint system protects your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "As project lead for [...] project, ..." or "In my 33 years...".

■ *I'm afraid of retaliation. What should I do?*

Cordaid does not tolerate any type of retaliation against complainants, people affected, witnesses, those tasked with handling a case or those supporting the person affected. When you fear or experience retaliation or breaches of confidentiality, please include this in the initial report or contact your Case Manager, the Integrity Officer, or a Security Advisor (if you fear for your safety). On a case-by-case basis, suitable measures will be put in place to ensure your protection. If the retaliatory behavior amounts to such, it will be considered misconduct in itself.

■ *How can I be sure my data is safe?*

The assurance of Data Safety is one of the reasons why Cordaid has decided to implement the EthicsPoint reporting system. It helps protect your report and your data from unauthorized access or accidental alterations.

In line with the EU General Data Protection Regulation (GDPR), Cordaid has conducted a Data Protection Impact Assessment for the implementation of EthicsPoint, and implemented recommendations from our Data Protection Officer to ensure the safety of your data.

■ *For Cordaid representatives: What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?*

The EthicsPoint system and report distribution ensure that implicated parties are not notified or granted access to reports in which they have been named.

#### **IV. What happens after reporting?**

■ *What can I expect after submitting the report?*

When submitting the report, you will receive a unique, randomized number called a "Report Key" and are asked to choose a password. You can return to the EthicsPoint system later to access the original report to add more detail, read any updates on your report, or answer any clarification questions that we may require to follow up on your report.



■ *Who will handle my report?*

When you submit a report, the Integrity Officer and, for reports of financial misconduct, the Internal Auditor, will receive a notification. Based on a pre-assessment of the report, the most appropriate Case Manager is determined who will be responsible to coordinate all follow-up actions in line with our Standard Operating Procedures. We will make sure that the Case Manager is not implicated in the report and is properly trained to deal with the sensitivities of integrity issues.

■ *How does Cordaid deal with integrity reports?*

Cordaid's Integrity [Standard Operating Procedures](#) describe how we deal with integrity reports. In short: we pre-assess the case, identify a Case Manager, launch an investigation, and follow-up with appropriate measures – where the investigation upholds the allegation, the follow up measures will include disciplinary measures such as a warning or dismissal.

In some cases, we will ask you for clarification questions before we fully open the case. Therefore, please make sure you check the portal using your “Report Key” for any messages or updates.

■ *What if I am so impacted by an incident that I need supports?*

We understand that experiencing interpersonal misconduct or fear of retaliation can be stressful, and even traumatizing at times. The Case Manager is responsible to ensure that your psychosocial, medical, legal or security-related support needs are met.

Cordaid representatives can also reach out to Cordaid's [Confidential Advisors](#) (internal) for additional support.

■ *Why does it take so long until I hear back on my report?*

We understand that it is frustrating if you have to wait for an update on your report. Please be assured that we try to deal with your case as soon as possible. However, more importantly than responding quickly, we need to ensure that we respond properly and thoroughly. This involves assessing the risks to all involved at all times, which takes time. Also, there may be times where we may need to prioritize more urgent cases – e.g. where acute action is required - over other cases that are less time-sensitive. We do our best to deal with your case as soon as possible.

■ *How can I trust my report is dealt with properly?*

Cordaid is training Case Managers to ensure they deal with integrity cases according to our procedures and in a professional, confidential, transparent, and – in the case of interpersonal misconduct – survivor-centered way. For full-scale investigations, the lead investigator must be trained and experienced in conducting integrity investigations in the given domain (i.e. safeguarding, fraud). Should you have any concern or doubts that your case was not dealt with according to Due Process, you can follow our Grievance Procedure as laid out in Cordaid's Standard Operating Procedures.



## V. Practical Tips & Best Practices

- *What if I remember something important about the incident after I file the report? Or what if Cordaid has further questions for me concerning my report?*

When you file a report at the EthicsPoint Web site, you receive a unique, randomized number called a “Report Key” and are asked to choose a password. You can return to the EthicsPoint system again and access the original report to add more detail or answer questions posed by the Case Manager. We strongly suggest that you return to the site in the time specified to answer any questions. You and the Cordaid now have entered into an “anonymous dialogue,” where situations are not only identified, but can also be resolved, no matter how complex.

- *Are these follow-ups on reports as secure as the first one?*

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity if you have selected that option.

- *What if I lose my Report Key or forget the Password I created?*

To ensure that security and confidentiality is maintained, if you lose your report key or password, you will need to file a new report. Please mention in the new report that it is related to a report or question you previously submitted.

- *Can I still file a report if I don't have access to the Internet?*

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers.

