



IMPACT INTEGRITY PROTOCOL

Final version (approved by IMPACT Board on 9 May 2023)

Table of contents

1	INTRODUCTION	2
2	GUIDING VALUES AND PRINCIPLES	3
3	IMPACT AS AN ORGANISATION.....	4
3.1	ORGANIZATIONAL INTEGRITY	4
3.2	FINANCIAL INTEGRITY	4
3.3	ETHICAL PURCHASING OF SERVICES AND GOODS	4
3.4	INTEGRITY OF THE PROFESSIONAL ENVIRONMENT.....	5
3.5	HIRING PROTOCOLS.....	5
3.6	PROCEDURE IN CASE OF A VIOLATION	6
4	IMPACT & STAFF.....	7
4.1	EXPECTATIONS.....	7
4.2	PROCEDURE IN CASE OF A VIOLATION INVOLVING STAFF	7
5	IMPACT & PROJECT PARTNERS	9
5.1	EXPECTATIONS DONORS & PARTNERS.....	9
5.2	PROCEDURE IN RESPONSE TO VIOLATIONS BY DONORS AND PARTNERS	9
5.3	COMPLAINT PROCEDURE FOR DONORS AND PARTNERS	10
6	IMPACT & VICTIMS/SURVIVORS	11
6.1	GUIDING PRINCIPLES.....	11
6.2	PROCEDURE TO WITHDRAW CONSENT FOR VICTIMS/SURVIVORS.....	12
6.3	COMPLAINT PROCEDURE FOR VICTIMS/SURVIVORS	13
7	IMPACT & STUDENTS.....	14
8	REVIEW AND APPROVAL	15

1 INTRODUCTION

IMPACT: Center against Human Trafficking and Sexual Violence in Conflict (hereafter IMPACT) is an independent and trusted expertise center that gives a positive contribution (IMPACT) to preventing and addressing trafficking in human beings (THB) and conflict-related sexual violence (CRSV). We, at IMPACT, are conscious of the sensitive field we work in. We work with victims/survivors of impactful crimes. As a result, we need to be extra careful in guaranteeing equality, respect, confidentiality, (data) integrity, and a protective environment.

We want to ensure that each person or organization working with IMPACT – as a partner, a donor, a board member, a staff member, a student a victim/survivor or otherwise – is treated with respect and dignity. We seek to create and maintain a safe environment where people can be who they are, irrespective of their culture, language, skin color, gender, nationality, religion, disability, beliefs, political opinion, sexual orientation, or any other. We aim to assure safe reporting mechanisms in case people feel their rights or safety are violated by IMPACT.

Further, we wish to be conscious about the partners and donors we work with and what we should undertake the moment that our relationship is negatively impacted or if they are connected to abuses or exploitative practices themselves. Also, we need to be conscious about the services and products we purchase ourselves. Ensuring these due diligence policies requires us to respond consciously, adequately, and swiftly.

This fits our vision of a world in which people live together respectfully and realize that we are dependent on each other to create a better world, a world free of violence. A world in which human trafficking and conflict-related sexual violence no longer take place by addressing and looking at these crimes separately and in combination.

The integrity protocol is subdivided in sections relevant for:

- (1) IMPACT as an organization
- (2) Staff
- (3) Donors and project partners
- (4) Victims and survivors
- (5) Students

2 GUIDING VALUES AND PRINCIPLES

- **Respect, dignity and non-discrimination:** The Integrity Protocol starts from the premise that IMPACT aims to create and maintain an environment where people are treated with respect and dignity. Nobody is discriminated against on the basis of characteristics, such as culture, language, skin color, gender, nationality, religion, disability, beliefs, political opinion, sexual orientation, et cetera.
- **Do no harm principle:** IMPACT seeks to avoid exposing people to additional harmful risks through our own actions.
- **Due diligence & accountability:** The Integrity Protocol aims to ensure that any integrity issue that comes to light within or connected to IMPACT is dealt with accordingly.
- **Transparency & accountability:** To ensure transparency and accountability, IMPACT provides insights into its objectives, policies, and expenditures. Management is accountable to an external, unremunerated board.
- **Compliance with applicable law and codes:** IMPACT seeks to comply with all applicable national and international laws, including codes that specifically address CRSV, THB and integrity issues, such as the Murad Code.
- **Living document:** The integrity document is actively pursued. It will be updated when and where necessary. This will allow IMPACT to respond anytime to misconduct that might have been unforeseen in this document.
- **Safeguarding integrity is everybody's responsibility:** While the document is formulated by IMPACT, each student, staff member, board member, project partner and donor has their own responsibility in safeguarding integrity.
- **Scope of application:** The Integrity Protocol is applicable to all students, staff members, board members, donors, victims/survivors and project partners connected to IMPACT.

3 IMPACT AS AN ORGANISATION

3.1 Organizational integrity

- 3 IMPACT has an ANBI status. This means that we meet certain requirements (e.g. external, independent board, annually publishing annual report/financial statement annually on the website) that show IMPACT is a trustworthy, independent and transparent NGO.¹
- 4 IMPACT had an CRKBO status. This means that we are a recognized educational institute. The certification can only be acquired after successfully going through an audit, that is repeated every four years. The requirements include transparency, integrity and quality.

3.2 Financial integrity

- 5 IMPACT pays taxes, salaries, and pensions on time and in accordance with the law in the country the office is based in. IMPACT will not move office to evade taxes.
- 6 IMPACT ensures payment of invoices within the statutory payment period in accordance with the law in the country the office is based in.²
- 7 IMPACT ensures financial transparency by publishing its annual report and financial statement on the website, on time and in accordance with the law in the country the office is based in.³

3.3 Ethical purchasing of services and goods

- IMPACT seeks, to the extent possible, to ensure that services and goods that are purchased are not linked to exploitation and/or abuse. Particularly when organizing events, IMPACTS inquires prior to selecting the venue about the human rights policy of the venue in question.
- Services include banking, pension, office space, hotels, restaurants, meeting venues, and travel arrangements. Products include e.g. coffee, tea, laptops, phones, printers, papers, gifts.
- IMPACT requires its management and staff to consider the environment (while printing, while buying office materials) and to leave venues responsibly (e.g. disposing/recycling of used materials).

¹ Belastingdienst, ANBI:

https://www.belastingdienst.nl/wps/wcm/connect/bldcontentnl/belastingdienst/zakelijk/bijzondere_regelingen/goede_doelen/algemeen_nut_beogende_instellingen/

² Eerste Kamer der Staten Generaal: https://www.eerstekamer.nl/wetsvoorstel/35769_verkorten_wettelijke_currently_30_days_period.

³ IMPACT – annual reports: <https://impact-now.org/annual-reports/> (overview annual reports and financial statements of IMPACT);

https://www.belastingdienst.nl/wps/wcm/connect/bldcontentnl/belastingdienst/zakelijk/bijzondere_regelingen/goede_doelen/algemeen_nut_beogende_instellingen/gegevens_van_een_anbi_publiceren_op_een_internetsite/financiele_v_erantwoording_publiceren (the date is currently set on 1 July of each year for organizations that have ANBI status).

3.4 Integrity of the professional environment

- IMPACT protects documents and data by storing all in a protective environment (with double authorization to access it). Staff data/information is kept protected and confidential, including personal information, and can only be accessed by management. Other team members only have limited access to documentation to the extent required for their work.
- IMPACT prohibits the downloading of programs and software that are not relevant for IMPACT's work while making use of the digital infrastructure of IMPACT at the office.
- IMPACT has a no-tolerance policy with respect to the deliberate misuse of the professional digital infrastructure (e.g. viewing/downloading/storing/spreading offensive materials such as discriminatory, racist, or pornographic content). Any breach of this rule will lead to an immediate investigation, possible dismissal and (if required) a report to the police.
- IMPACT activities are mainly shared through the official social media) channels of IMPACT. Staff can share IMPACT activities through their own channels with prior approval.
- IMPACT staff has the freedom of expression on social media in personal capacity. If, however, the content infringes upon the core principles of IMPACT's organization to the extent that it negatively impacts the work, IMPACT has the right to terminate the staff's contract.
- IMPACT foresees a professional working environment, where people respect each other's space.
- IMPACT seeks to engage in projects that have a long-term positive (social) impact.

3.5 Hiring protocols

- IMPACT ensures equality at the workplace. This means that people are not treated unfairly because of reasons protected by discrimination laws ('protected characteristics', such as culture, language, skin color, gender, nationality, religion, disability, beliefs, political opinion, sexual orientation, et cetera).
- IMPACT stands for equal job opportunities and fairness for employees and job applicants. During the recruitment and deployment processes the integrity principles and expectations regarding good conduct are being discussed.
- When becoming part of the IMPACT team (as a volunteer, intern, staff member, or management or board member) a labour contract is signed together with this Integrity Protocol and a confidentiality agreement.
- IMPACT is not bound by a collective bargaining agreement, but since IMPACT works in the social field and wishes to ensure minimum standards, it follows the collective bargaining agreement "Welzijn and Zorg" as far as wage and remuneration are concerned.⁴

⁴ FNV: <https://www.fnv.nl/cao-sector/zorg-welzijn/cao-overzicht>

- IMPACT requires new staff members to submit a certificate of Good Conduct (of which the costs can be reimbursed).

3.6 Procedure in case of a violation

1. IMPACT management is informed or discovers itself a violation of any of the ethical principles that apply to IMPACT as an organization (and as listed above).
2. If the violation involves staff of IMPACT, IMPACT management will be informed (co-directors: Anne-Marie de Brouwer, a.debrouwer@impact-now.org and/or Eefje de Volder, e.devolder@impact-now.org).
3. If the violation involves IMPACT management, a board member of Impact can be informed [[Suzanne Hoff, sh@lastradainternational.org, +31(0)614 44 40 66].
4. If requested, the identity of the 'whistleblower' will remain unknown, to the extent possible.
5. The person allegedly involved in the violation is asked to explain the situation.
6. If it is a minor issue that can be resolved, the person and IMPACT management will decide on the action that needs to be taken to resolve the situation.
7. In case it involves a major violation, or it involves a person from IMPACT management, the board (together with IMPACT management not involved) will discuss the issue and decide on what needs to be done in response.
8. Decisive action is taken. The whistleblower, if known, is informed about the way in which the violation is handled.

4 IMPACT & STAFF

4.1 Expectations

- IMPACT staff have signed the confidentiality agreement and Integrity Protocol along with their work contract.
- IMPACT foresees a professional, safe, and supportive working environment, where people respect each other's space. This is a shared responsibility among staff.
- IMPACT requires staff to engage solely in professional relationships in the professional setting.
- IMPACT has a no-tolerance policy with respect to the deliberate misuse of the professional digital infrastructure (e.g. viewing/downloading/storing/spreading offensive materials such as discriminatory, racist, or pornographic content). Any breach of this rule will lead to an investigation, possible dismissal and (if required) reporting to the police.
- IMPACT staff has the freedom of expression on social media in a personal capacity. If, however, the content infringes upon the core principles of IMPACT's organization to the extent that it negatively impacts the work, IMPACT has the right to terminate the contract.
- At IMPACT we do not tolerate the abuse of substances during working hours.
- At IMPACT we avoid inappropriate, harassing, abusive, demeaning, or culturally inappropriate language.
- At IMPACT we do not tolerate activities that are likely to harm (emotionally, physically, sexually, et cetera.), including aggression, discrimination, and bullying (bullying includes making offensive/demeaning jokes, and excluding others).
- At IMPACT we work towards a mutual understanding (showing respect, participating in mutual consultation, holding each other accountable).
- At IMPACT we treat each other's information with sensitivity and confidentiality.
- At IMPACT we respect people in recorded materials (ensuring consent).
- IMPACT Staff is prohibited to use information of victim/survivors in any way without explicit, prior, written, and informed consent.

4.2 Procedure in case of a violation involving staff

- In case of a question about making the right decision, you can ask for clarification or guidance from your first-line officer. If the issue concerns your first-line officer, you can ask another person from IMPACT's management or, if the response is not satisfactory, one the board members.
- Staff who voice concerns in good faith will be protected from retribution.
- Reporting structures are safe, confidential, and impartial.
- All complaints will be accepted for further investigation.
- Making false reports is not acceptable.
- Information obtained through complaints procedures may be used to inform policy later on.

- If the misconduct constitutes a breach of law then the information will be sent forward to law enforcement. Also false reporting will be sent forward to law enforcement.

Procedure:

1. Confine with your **first line responder** to discuss the issue first and try to resolve it.
2. **Internal confidant:** If the issue cannot be resolved with your first line manager, you can contact a member of management and try to discuss and resolve the issue. If this does not help or the issue involves management, you can contact a board member of IMPACT (to whom management is accountable and who is responsible for the policy and strategy of IMPACT) [Suzanne Hoff, sh@lastradainternational.org, +31(0)614 44 40 66]. The board member can deal with the issue itself, or discuss with the other board members. In the latter case The board might ask IMPACT management to explain the situation and then the board will discuss and decide how to deal with the issue.
3. **External confidant:** If you do not feel safe sharing the issue with the internal confidant, or you are not satisfied with how the board has handled your issue, you can contact the external confidant [Anna Meijknecht, e-mail: ameijknecht@gmail.com, tel. +31(0)6-42594990]. This person is not affiliated with IMPACT and has signed a confidentiality agreement to respect the privacy of the complainant and the issue arisen, if so desired. The external confidant will advise the person in resolving the issue vis-à-vis IMPACT.

5 IMPACT & PROJECT PARTNERS

5.1 Expectations donors & partners

Donors

- IMPACT expects donors to commit to and behave in compliance with our Integrity Protocol and integrity/ethical protocols that apply to working with survivors, such as (for CRSV) the Murad Code.⁵
- IMPACT commits itself to inform donors on issues that can have an impact on their reputation.
- IMPACT conducts a rapid background check into donors/funds before accepting/ applying for funding to ensure donors are not in any way involved in exploitation and/or abuse.
- IMPACT only accepts funding for projects that meet IMPACT's values, including the respect for the dignity of all involved.
- IMPACT is transparent about its donors by publishing their names on the website.
- IMPACT has the right to publicly speak out against a donor and to break off the relationship in case a donor is connected to unethical behavior.
- When IMPACT receives donations, it will check where the donation is coming from and whether it is trustworthy. If there are doubts, the money will be sent back.

Partners

- IMPACT expects project partners to commit to and behave in compliance with our Integrity Protocol and integrity/ethical protocols that apply to working with victims/survivors, such as (for CRSV) the Murad Code.
- IMPACT commits itself to informing partners on issues that can have an impact on their reputation.
- IMPACT conducts a rapid background check on potential partners before entering into partnerships.
- IMPACT signs a contract with partners to ensure (1) the goals, expectations and values underlying the project are clear; (2) intellectual property rights are arranged; (3) information from victims/survivors are handled in line with the Murad code; (4) agreement on communication strategy is clear (e.g. not sharing project information before it is agreed that details can be shared).

5.2 Procedure in response to violations by donors and partners

1. The IMPACT project contact person contacts the donor/partner to discuss the issue.
2. IMPACT discusses in the team whether the issue can be resolved or is unrepairable.

⁵ Murad Code: <https://www.muradcode.com/murad-code>

3. IMPACT management informs the board about the issue. If it is an easily solvable issue, the board will just be updated. If the issue is severe, the board will be asked for advice on the proposed action to be taken.
4. Depending on the severity of the issue, actions can include resolving the issue, terminating the relationship, making the issue and response public.

5.3 Complaint procedure for donors and partners

1. The donor/partner can inform their first person of contact at IMPACT to express their complaint, or someone (else) from management, to discuss the issue first and try to resolve it.
2. **Internal confidant:** If the issue cannot be resolved within the IMPACT team, the donor/partner can contact the board of IMPACT (to whom management is accountable and who are responsible for the policy and strategy of IMPACT) [*Suzanne Hoff, sh@lastradainternational.org, +31(0)614 44 40 66*]. The board might ask IMPACT management to explain the situation and then the board will discuss and decide how to deal with the issue.
3. **External confidant:** If the donor/partner does not feel safe to share the issue with the board, or is not satisfied with how the board has handled the issue, the donor/partner may contact the external confidant [*Anna Meijknecht, e-mail: ameijknecht@gmail.com, tel. +31(0)6-42594990*]. This person is not affiliated with IMPACT and has signed a confidentiality agreement to respect the privacy of the complainant and the complaint, if so desired. The external confidant will advise the donor/partner in resolving the issue vis-à-vis IMPACT.

6 IMPACT & VICTIMS/SURVIVORS

6.1 Guiding principles

- IMPACT seeks to ensure a work environment with victims/survivors that ensures equality, dignity, respect, privacy and safety.
- IMPACT commits itself fully to the Murad Code⁶ which distills existing minimum standards for the safe, effective, and ethical gathering and use of victim/survivor information. While the Murad Code is designed in relation to victims/survivors of conflict-related sexual violence, IMPACT believes the Murad Code is also applicable to survivors of THB. This includes, *inter alia*:
 - **Understand survivors as individuals** (adapt to survivor's individuality; counter assumptions; ask the survivor; prioritize survivor safety; identify heightened risks; support access to justice; respect self-identity; be inclusive and do not discriminate)
 - **Respect survivor control and autonomy** (avoid approaching survivors unexpectedly; respect a survivor's choices; survivor control over their information; supported decision-making; reduce pressures; ensure realistic expectations; be clear on limitations; honor withdrawal of consent)
 - **Be responsible and have integrity** (dignity and respect; do not stigmatize; ensure accuracy; do not exploit survivors; be trustworthy; do not damage potential evidence; be accountable)
 - **Add value or don't do it** (make responsible decisions; what is our role and purpose? Are there alternative sources? Are our intended outcomes realistic? Will we add value? Weigh added value against risks; challenge drivers of bad practice; minimize exposure risks; information-sharing; data minimization)
 - **Preparation is the foundation** (prepare first; ensure flexibility for survivor choices; assess and mitigate risks; remote interactions; know who else is gathering information; know about available support; coordinate and cooperate; prepare for unexpected disclosure; enable follow-up; brief your team and partners)
 - **Know and understand the contexts** (know the context, understand the culture, understand gender; understand stigma towards CRSV, THB? and survivors; identify community dynamics; recognize individual, compounded, and collective harms; be familiar with law and practices; understand appropriate communications and interactions; minimize negative repercussions; community-based sustained support)

⁶ <https://www.muradcode.com/murad-code>

- **Gather information from other sources** (look for information not from or about survivors, source representative information; recognize rights and risks from indirectly sourced information; verify survivor intention; do not undermine trust in humanitarian services)
 - **Take the time, create the space** (be ready; reduce time pressures; create a supportive environment; ensure privacy; prioritize safety and quality over quantity; understand delayed and partial disclosures)
 - **Ensure respectful and safe interactions** (assess and be alert, be trauma-sensitive, respect personal space, create a safe interview process, give survivor control over how they tell their story, ask open questions, do not ask if you do not need to)
- IMPACT's work is based on the do no harm principle: our work should reduce further harm, including re-traumatization.
 - IMPACT undertakes projects and activities with the interests of victims/survivors in mind.
 - IMPACT consults with victims/survivors where possible and ensures survivor-friendly language in its communication.
 - IMPACT ensures that when working with survivors, practical guidance is provided in a language that they understand to ensure they know where they commit themselves to and what their rights are with respect to data protection, withdrawal of consent and in case of a complaint.
 - When IMPACT includes victim/survivor information it is always based on prior and informed (written) consent. When acquiring consent, IMPACT seeks to be as transparent as possible about the potential impact of participating in a project (e.g. materials being shared (and thus remaining available) on social media). Victims/survivors are simultaneously informed how their consent can be withdrawn.
 - IMPACT ensures data protection. This means project documentation is stored in a protective environment and that data from previous projects is anonymized after two years (or earlier if a project description so requires).

6.2 Procedure to withdraw consent for victims/survivors

It is important that victims/survivors can withdraw their consent to participate in a project at any time, also when the project has been concluded.

- (Representatives of) victims/survivors contact IMPACT (info@impact-now.org, tel. +31(0)6-14282748 or +31(0)6-18804890) with the request to withdraw.
- IMPACT responds within one week to ensure that the withdrawal of consent is administrated (e.g. removing personal data).
- If the (representatives of) victims/survivors have doubts about the way in which the withdrawal of consent is handled, they can reach out to a member of the board [Suzanne

Hoff, sh@lastradainternational.org, +31(0)614 44 40 66]. who will verify whether action has been taken accordingly.

6.3 Complaint procedure for victims/survivors

1. The victim/survivor confides with the IMPACT **project leader** to discuss the issue first and to try to resolve it.
2. If the project leader is not part of management, management will be informed.
3. **Internal confidant:** If the issue cannot be resolved with the project leader and/or management, a board member of IMPACT can be contacted (to whom management is accountable and who are responsible for policy and strategy of IMPACT) [*Suzanne Hoff, sh@lastradainternational.org, +31(0)614 44 40 66*]. The board might ask IMPACT management to explain the situation and then the board will discuss and decide how to deal with the issue.
4. **External confidant:** If the victim/survivor does not feel safe to share the issue with the internal confidant, or is not satisfied with how the board has handled the issue, the external confidant can be contacted [*Anna Meijknecht, e-mail: ameijknecht@gmail.com, tel. +31(0)6-42594990*]. This person is not affiliated with IMPACT and has signed a confidentiality agreement to respect the privacy of the complainant and the complaint, if so desired. The external confidant will advise the person in resolving the issue vis-à-vis IMPACT.

7 IMPACT & STUDENTS

IMPACT also provides education. In the case where IMPACT staff is hired by a university to guest lecture or supervise a thesis, the rules and regulations of that university apply (including the complaint procedure).

In case the education offered is developed by IMPACT, the terms and conditions and the privacy statement applicable to the course apply.

For the Winter course and the Summer course in cooperation with Tilburg University, the [IMPACT privacy policy](#) (including data protection) and the [IMPACT terms and conditions](#) (including the complaint procedure) apply.

8 REVIEW AND APPROVAL

- The Integrity Protocol is a living document. The document will be changed when necessary.
- Annually the Integrity Protocol will be discussed with the board and if needed updated (along with the annual report and the financial statement).
- The annual update of the Integrity Protocol is published on the website, along with the annual report and the financial statement of that year.⁷
- IMPACT documents integrity issues and during the annual review the integrity issues will be discussed (and integrated into the annual report).

⁷ Impact – annual reports: <https://impact-now.org/annual-reports/>