ecdpm

Speak-up, complaints, safeguarding and integrity reporting framework

Condensed version



This document, available publicly via ecdpm.org, summarises ECDPM's procedure for receiving, assessing, protecting, investigating and resolving reports of suspected wrongdoing, inappropriate behaviour, safeguarding concerns and breaches of its code of conduct, integrity and safeguarding standards. The full framework is available to ECDPM Board members, management, employees, interns, fellows, associates, partners, consultants, research participants and other persons working with ECDPM.

1. Purpose, scope and safeguards

ECDPM's speak-up, complaints, safeguarding and integrity reporting framework establishes ECDPM's procedure for receiving, assessing, protecting, investigating and resolving reports of suspected wrongdoing, inappropriate behaviour, safeguarding concerns and breaches of ECDPM's code of conduct, integrity and safeguarding standards. It is available to ECDPM Board members, management, employees, interns, fellows, associates, partners, consultants, research participants and other persons working with ECDPM. It also covers individuals who experience or witness misconduct in connection with ECDPM's work. It covers whistleblowing concerns, financial misconduct, conflicts of interest, harassment, discrimination, retaliation, safeguarding and sexual exploitation, abuse or harassment.

The Dutch Whistleblower Protection Act (Wet Bescherming Klokkenluiders), relevant EU and national rules, data-protection obligations and donor requirements apply where relevant. The legal status of a concern is assessed by ECDPM; reporters need not classify it themselves. ECDPM prohibits retaliation, protects identities under applicable law and guarantees fair treatment of both reporting and reported persons. No person implicated may control the case.

2. Reporting, confidential advice and immediate safety

A report may be made in writing, by telephone or other oral means, or at a requested in-person meeting within a reasonable time, via one of the routes outlined in the table below. ECDPM will provide accessible contact details and reasonable language support. Oral reporting will be accurately documented; recordings require the reporter's prior consent, and written records of oral reports must be offered for checking and correction in accordance with applicable law. Anonymous reports will be assessed where feasible.

For immediate danger, child-protection concerns, serious violence or sexual exploitation, abuse or harassment, safety, medical needs, evidence preservation and specialist support take priority. Support is not conditional on a formal complaint or police report, unless a specific legal obligation requires referral. Confidentiality limits will be explained, and the wishes and safety of affected persons will be considered wherever law permits.

Route	Function and limitations
Integrity officer	Primary independent route for formal integrity and safeguarding reports and case coordination.
Head of HR / management	May receive a concern; promptly refers formal reports to the Integrity Officer or independent alternative. HR supports employment and workplace measures.
Confidential advisers (internal or external)	Provide confidential advice, support and explanation of options. Contact does not automatically create a formal report; they do not investigate or decide cases.
Board escalation	Use BECchair@ecdpm.org or Boardchair@ecdpm.org where management, the Integrity Officer or case independence is in question.
External competent authority	Reporters may use an applicable external route without first reporting internally. Emergency services should be contacted immediately if safety requires it.

3. Roles and decision authority

Role	Responsibility
Integrity officer	Logs formal reports, acknowledges, assesses conflicts and immediate risks, recommends or arranges referrals and protection, coordinates follow-up and feedback; does not authorise a formal investigation or decide sanctions.
Alternative case handler	A competent and impartial person formally designated by the Executive Board when the integrity officer is unavailable, implicated or conflicted; appointed instead by the Supervisory Board if the Executive Board cannot act independently. Performs intake/assessment, not automatic investigation or sanction authority.
Executive Board	Authorises investigations, appoints impartial investigators and assigns an unconflicted decision-maker, unless implicated or unable to act independently.
Supervisory Board / unconflicted Board authority	Assumes investigation and decision oversight where Executive Board involvement or conflicts require independence, including independent external appointment where appropriate.
Investigator / safeguarding expert	Establishes relevant facts under written terms of reference, with specialist sexual exploitation, abuse or harassment competence where required; reports findings, not normally sanctions.
HR, finance and confidential advisers	HR: employment measures and staff support. Finance: financial controls/evidence. Confidential advisers: confidential advice only. No investigation or sanction authority by virtue of these roles.

A written designation must identify the alternative case handler, back-up route, required expertise, direct reporting line, access controls and recusal arrangements. An internal confidential adviser should not routinely also act as alternative case handler because that can compromise the confidential advisory role.

4. Case handling: Five stages

1. Receipt and record

- Formal report to integrity officer or unconflicted alternative; respect reporter wishes and legal/safety duties.
- Open restricted case record; acknowledge within 7 days unless unsafe or impossible.

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2. Initial assessment

- Assess credibility, safety, retaliation, conflicts, evidence and legal/donor duties.
- Document rationale and recommend HR referral, grievance, safeguarding response or investigation.

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3. Decision on next steps

- Integrity officer coordinates support, protective measures, referral or preliminary enquiries within authority.
- Formal investigation requires Executive Board approval, or Supervisory Board approval if independence requires.

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4. Investigation, if required

- Authorising Board appoints independent investigator and approves written terms of reference.
- Ensure impartiality, confidentiality, sensitivity and right to respond; mediation cannot replace sexual exploitation, abuse or harassment investigation.

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5. Decision, feedback and closure

- Unconflicted authorised decision-maker reviews findings and fairness, then decides proportionate action.
- Record feedback, outcomes, support, corrective actions, owners, dates, notifications and closure.

5. Deadlines, protection and data

A formal report will normally be acknowledged within 7 days of receipt. Feedback on assessment and follow-up will be provided no later than 3 months after acknowledgement, subject to lawful confidentiality and safety constraints; investigations need not be completed

by that deadline. Where a process continues, ECDPM will provide a meaningful progress update and explain further anticipated communication.

Protective measures may include no-contact directions, adjustments to reporting lines, medical or psychosocial support, monitoring for retaliation and preservation of evidence or financial controls. Interim measures do not imply guilt and must be documented and reviewed. Complaints about retaliation are treated as separate concerns.

Case information is kept in a restricted register, accessible only to authorised persons on a need-to-know basis. Identity protections, secure storage, accurate records and retention periods comply with the General Data Protection Regulation (GDPR), the Dutch Whistleblower Protection Act and other applicable requirements. Disclosure is limited to what is legally necessary, including to ensure fair process or protect safety.

6. External reporting, donor duties and oversight

The integrity officer, in consultation with HR and relevant finance/executive functions as appropriate and without conflicts, coordinates prompt assessment of any notification duty to the Dutch Ministry of Foreign Affairs, other donors, regulators, insurers, police or protection authorities. The responsible unconflicted Executive Board or Supervisory Board authority approves organisational notifications where required. Required preliminary notification must not be delayed solely pending investigation completion. The basis, timing and content of each decision are recorded.

The management team ensures resources, communications, training and implementation. At least annually, the Board receives suitably anonymised information on concerns, response times, outcomes, retaliation, corrective actions and lessons, with precautions against identification in a small organisation. The head of HR and integrity officer review this framework annually during initial implementation and at least every two years thereafter.