



INTEGRITY POLICY

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1. Background and Purpose of the Integrity Policy

1.1. Background

The integrity policy was developed following the Integrity Charter that VLIRUOS signed in 2018. This policy is closely aligned with the values that define VLIRUOS as a values-driven organisation.

VLIRUOS has consistently profiled itself as a values-driven organisation. Respectful and ethical conduct, both within the organisation and within the project frameworks, has always been a fundamental principle. This was clearly expressed in successive policy documents that set out the mission, vision and core values of VLIRUOS. These principles are also anchored in policy frameworks on cross-cutting themes such as gender, diversity and inclusion, as well as in contracts, codes of conduct and numerous other VLIRUOS documents.

The primary efforts have centered around developing and implementing the integrity policy within VLIRUOS as an organization, recognizing that ultimate responsibility for integrity within VLIRUOS-funded projects rests with the Flemish and local partner institutions. VLIRUOS's role involves creating a framework, facilitating information flow, raising awareness, facilitating, mediating where relevant, recording signals, and monitoring compliance.

Integrity remains prominently on the agenda of Flemish universities and universities of applied sciences. Considerable efforts have been made in recent years, both individually and through VLIR-facilitated initiatives. VLIRUOS has actively participated in these initiatives, particularly over recent years, by further professionalizing internal operations and inspiring practices within individual institutions—both Flemish and local partners.

In this context, reference is also made to the explicit commitment of Flemish universities to ensuring a safe learning and working environment, particularly concerning social safety and inappropriate conduct. Under the auspices of the Flemish Interuniversity Council (VLIR 2018–2022–2024), systematic action areas have been established, achieving significant progress. The universities commit to ongoing critical reflection on their internal organizations and systematic evaluation of policies and practices.

Recent global developments, including the COVID-19 pandemic and its societal impacts, the decolonization debate, the human rights discourse within Flemish universities and universities of applied sciences, and significant recent geopolitical shifts, prompted a reassessment of our mission, vision, and values. Concurrently, since 2022, VLIRUOS initiated an internal transformation, fundamentally rethinking its role—from an administrative, coordinating, and controlling organization to one that connects, learns, and inspires. The new accreditation process offered an opportunity in 2024 to actively formulate a renewed mission, vision, and core values, translating these into an updated ethical code—aimed at future resilience.

1.2. Purpose

The VLIRUOS integrity policy acts as a guideline for ethical conduct within VLIRUOS. It provides a standard for determining integrity within the organisation and addressing potential breaches. Integrity must form part of the daily attitude and spontaneous reflex of everyone involved in the organisation's activities and VLIRUOS-funded projects.

The integrity policy comprises the following components:

- The ethical code: serving as the ultimate reference for conduct within the organisation and project operations. This code is rooted in the VLIRUOS mission, vision, and core values.

- The integration of integrity into everyday operations, differentiating VLIRUOS as an organisation from Flemish and local partner institutions. This approach is formalised in the ethical code, policy frameworks, proactive and preventive actions, and through reporting and addressing procedures for integrity breaches, clearly defining roles and responsibilities.

2. Scope of the integrity policy

2.1. Context

VLIRUOS is the principal platform for academic cooperation in the context of global sustainable development. Using funds from the federal government, the organisation acts as the main funder for partnerships and scholarships between academics from Flanders and the Global South. By supporting partnerships aimed at mutual capacity development, VLIRUOS strengthens higher education institutions worldwide, enabling them to effectively fulfill their societal role as drivers for change. VLIRUOS also awards scholarships for educational programmes, thereby supporting the training of students and professionals to become critical, knowledgeable, and resilient global citizens capable of addressing global societal challenges with knowledge and dedication.

VLIRUOS is part of the legal entity VLIR and functions as a member-based organisation. VLIRUOS is the formal contracting party for the federal government, responsible for managing resources dedicated to academic cooperation for global sustainable development.

To achieve its objectives related to academic cooperation for global sustainable development, a framework has been established with clear role divisions between VLIRUOS and the Flemish universities and universities of applied sciences. VLIRUOS is responsible for policy and programming, selection, monitoring, and evaluation of projects, including financial accountability to the government regarding the use of allocated subsidy budgets. Universities and universities of applied sciences propose the projects related to the programmes and execute them after selection and approval by VLIRUOS and DGD (Directorate-General for Development Cooperation and Humanitarian Aid). For project execution, involved Flemish and local partner institutions sign agreements with VLIRUOS. Final responsibility for execution lies with the Flemish and local partner institutions. This means that during execution, all involved policymakers, academics, staff, and students are subject to policies and practices, including governance, of their respective institutions, which includes their own integrity policies.

2.2. Scope of the Integrity Policy

VLIRUOS positions itself as a member organisation and as a non-executive umbrella organisation within a network of diverse partners. A distinction is made between two levels: on the one hand, the VLIRUOS organisation itself, and on the other, the level of projects and their executors. This distinction will consistently be maintained.

2.2.1. VLIRUOS as an organisation

This policy document focuses on integrity policy at the level of VLIRUOS. Four categories are distinguished here: the governors, i.e., members of the Bureau UOS; the VLIRUOS team; members of VLIRUOS selection committees; and consultants contracted by VLIRUOS.

2.2.2. Integrity within executing Flemish and local partner institutions

Responsibility for integrity in projects funded by VLIRUOS and potential integrity breaches that might occur at VLIRUOS's partner institutions—namely the Flemish and local institutions—rests with the involved institutions. The division of responsibility between VLIRUOS and executing partner institutions is clarified below.

As a grant manager, VLIRUOS sets out the formal, conceptual, and operational framework for projects. How these projects are executed and how integrity issues within this context are managed is the responsibility of the respective project partners. In the event of integrity breaches, individuals involved in projects should primarily contact the competent services of their own institution or those of their partner institution. Ownership of integrity within these projects belongs to these institutions. VLIRUOS has an obligation to report, meaning it must forward (perceptions of) integrity breaches to the involved institutions and ensure appropriate actions are taken at that level. The role played by VLIRUOS in VLIRUOS-funded projects involves creating frameworks, facilitating information flow, raising awareness, facilitating processes, mediation if appropriate, registration, and monitoring.

VLIRUOS establishes a general framework containing minimum criteria that all executing project partners must respect. However, how institutions shape their own policies and practices is determined individually. VLIRUOS may systematically (e.g., for significant funding like IUC programmes) or on an ad hoc basis request institutions' respective policies and practices.

VLIRUOS must always act objectively and neutrally, respecting equality, and starting from the standpoint of responsibility of the involved institutions. Signals concerning potential integrity breaches in projects will always be recorded, and VLIRUOS will ensure appropriate follow-up, again respecting partner institutions' responsibility and exercising necessary discretion.

The standard integrity assessment within each Flemish higher education institution typically includes at least the following elements, understanding that each institution concretises this autonomously, recognising it as a 'living' policy and practice, and noting differences among institutions:

- Each researcher and specific research project must adhere to ethical rules laid down in respective institutional charters and applied by respective ethical committees. Especially for medical, veterinary, pharmacological, etc., research, such committees oversee researchers' correct ethical conduct. This also applies to research with international partners, as is the case for VLIRUOS projects, where local ethical clearance is often also required.
- Human rights is an important theme for Flemish institutions. VLIR developed a human rights framework, implemented individually by each Flemish university through their own policies and

advisory bodies. Practically, each university has committed to preceding its collaborations with a human rights assessment to ensure partnerships do not negatively impact human rights. Knowledge security is also particularly important. A human rights assessment may be carried out before a project starts or during its implementation due to specific events or concerns.

Universities of applied sciences can appeal to committees of associated universities. For more details and the other aspects of integrity that are monitored at the level of the institutions, reference is made to the individual policy and operational framework of the institutions concerned.

Given the increasing importance of integrity within both Flemish and local partner institutions, VLIRUOS intends to further develop its role in VLIRUOS-funded projects. Currently, this role includes creating frameworks, facilitating information flow, raising awareness, facilitating processes, mediation if appropriate, registration, and monitoring. The mediation role, in particular, will be elaborated further, including attention to developing procedures in case of (perceptions of) integrity breaches by individuals connected to various institutions. As an umbrella organisation encouraging multi-institutional collaboration, it is important to develop both policy and operational frameworks.

3. Integrity Policy

3.1. Definition of Integrity

3.1.1. General

A definition of integrity in terms of ethical conduct can be found in government guidelines:

"Acting according to written and unwritten values and standards expressing concepts such as righteousness, inviolability, incorruptibility, carefulness, purity of intent, consciously acting in good faith, reliability, and credibility."

(Description: Flemish Parliament, Clarification 922, 2013-2014)

Furthermore:

"Correctly handling resources and people by everyone (from top to operational level)."

(Description: Flemish government: <https://www.vlaanderen.be/informatie-voor-hr-professionals/organisatie-0/integriteitsbeleid-uitwerken>)

These broad definitions fully align with the extensive vision of what the integrity policy of VLIRUOS should embody and inspire its structure. To concretise this, VLIRUOS relies on its core values, thus establishing a clear and broadly supported integrity policy. This bundles rules, norms, and values guiding everyday actions.

3.1.2. Three Dimensions

In VLIRUOS operations, three dimensions regarding integrity are identified: financial, moral, and scientific integrity.

- Financial integrity involves responsible acquisition and use of resources, accurate reporting, and the absence of fraud and corruption.
- Moral integrity concerns acting according to values and norms, respecting human relationships within a sustainable society and environment.

- Scientific integrity involves ethically conducting research, ensuring research subjects and methodologies operate within ethically responsible frameworks.

The responsibility of VLIRUOS as an organisation primarily focuses on financial and moral integrity, whereas that of involved Flemish and local partner institutions includes financial, moral, and scientific integrity.

3.2. VLIRUOS, a “Value-Driven” Organisation

3.2.1. VLIRUOS Mission

We envision a world where higher education, research, and international partnerships contribute to practical solutions and evidence-based policies, empowering critical, resilient global citizens to act in society. This fosters sustainable development both locally and globally, ensuring a better future for all.

3.2.2. VLIRUOS Vision

To achieve this vision, VLIRUOS assumes various roles:

- As a grant manager, developing and overseeing diverse grant programmes fostering equitable partnerships between Flemish higher education institutions, academics, their peers in the Global South, and other stakeholders, providing opportunities for innovation.
- As a platform, assembling diverse groups to create multi-stakeholder partnerships and networks, empowering them as change agents.
- As a knowledge hub, creating, pooling, and mobilising knowledge and best practices for global sustainable development.

3.2.3. VLIRUOS Values

Act as one

Belief in multi-institutional, multi-disciplinary, multi-stakeholder partnerships to address global challenges. Combining strengths and resources ensures alignment, efficiency, and impactful work.

Be committed

Dedicated engagement in projects. Passion fuels collaborations, ensuring meaningful results for partner communities.

Act with integrity

Active engagement with partners and stakeholders, ensuring actions align with core values of respect and transparency, fostering trust and collaboration.

Embrace diversity and Inclusivity

Promoting inclusive, equitable partnerships, actively involving groups at risk of exclusion. This approach is rooted in respect for human rights and appreciation of diversity.

Embrace change

Collaborating with partners to create sustainable solutions addressing evolving global and local challenges. Flexibility ensures long-lasting impact.

3.2.4. Ethical Code

Integrity must form part of the daily attitude, the spontaneous reflex of everyone involved in VLIRUOS operations and funded projects. An ethical code based on VLIRUOS core values and mission was recently updated, forming an integral part of the integrity policy.

This ethical code applies to everyone linked to VLIRUOS assignments, including UOS Bureau members, all staff, VLIRUOS selection committee members, and consultants working on VLIRUOS assignments. Compliance is formalised through contractual commitments or formal mandates.

Staff and partners are critical to realising ambitions such as "sharing minds, changing lives" through "Connect – Learn – Inspire," thereby creating societal added value. Their commitment supports strategic academic partnerships between Flemish higher education institutions and their Global South partners, contributing to global sustainable development. Trust from partners, donors, institutions, and individuals is earned daily, guided by core values.

For VLIRUOS-funded projects, VLIRUOS's role involves creating frameworks, facilitating information flow, raising awareness, facilitation, mediation if necessary, registration, and monitoring. Future contracts will explicitly reference the ethical code.

3.3. Integrity and VLIRUOS as an Organisation

Integrity management aims to reduce risks of integrity breaches and adequately respond if needed. Based on the 2018 Integrity Charter and referencing the Royal Decree of 28 February 2023, the integrity policy was developed, including preventive and corrective components addressing moral and financial integrity risks. The organisation has an ethical code, a complaints procedure for integrity issues, and allocates necessary resources to operationalise the policy.

Integrity policy applies to four VLIRUOS categories: governors (Bureau UOS members), VLIRUOS team, VLIRUOS selection committee members, and consultants contracted by VLIRUOS. Integrity commitments and ethical code adherence are documented explicitly in agreements (see referenced documents in section 6).

3.3.1. Bureau UOS

In addition to the code of ethics, there is a policy framework developed by the Bureau of Rectors of the VLIR for the composition and functioning of the Bureau UOS as the VLIR's policy body for academic cooperation for global sustainable development. This established criteria for individual membership of the Bureau UOS, as well as a number of incompatibility rules. For example, Bureau UOS members are not allowed to submit new project proposals during their mandate, and thus compete with proposals from other academics, to ensure absolute objectivity and neutrality and a clear separation between policy and project implementation. A code of conduct was developed for the members of the Bureau UOS in 2020 to guide their actions as individual members but also for the Bureau UOS as a college. All members must sign this code of conduct before the start of their mandate. It stipulates, among other things, that in case of a suspected conflict of interest, the Bureau UOS member concerned must report it, after which appropriate measures will be taken in decision-making and/or in operational functioning of VLIRUOS.

3.3.2. VLIRUOS team

The Code of Ethics was recently updated. It is the pre-eminent guideline for individual and collective action for VLIRUOS staff members, the so-called VLIRUOS team. This code was communicated and clarified internally and will be presented to every employee for signature in early 2025, in conjunction with awareness-raising around the topic.

As part of the documents to be signed upon recruitment, an 'IT acceptable use policy' will also be submitted for signature to every employee, in which the correct and honourable use and handling of data and IT are formally enshrined.

Upon recruitment, a recent extract from the criminal record will now also be requested for inspection for members of the management team and for HR and financial positions, as proof of integrity in the past, i.e. not having been convicted of acts such as corruption, embezzlement, etc.

3.3.3. VLIRUOS selection committees

The VLIRUOS selection committees are responsible for selecting project proposals. They must do so with independence and objectivity, and in line with the Call and Selection Framework and VLIRUOS instructions. The committees are constituted on the basis of periodic Calls for Experts. Members of the selection committees are subject to the Code of Ethics. In addition, members are presented with a 'Code of Conduct' for signature upon appointment. With this, they declare to be independent and objective and to immediately report any conflicts of interest in project selection to VLIRUOS so that appropriate action can be taken. To maintain independence, the committees are regularly reconstituted with a view to renewal and dynamisation. In principle, a member can only belong to one committee, to avoid concentration of power among a limited number of people.

3.3.4. Contractors

VLIRUOS works with suppliers as part of its own operations, e.g. IT suppliers, communication partners, HR partners, accounting, ... When the contract is awarded, mention is made of VLIRUOS' core values and code of ethics. When submitting a tender in response to a request for tender under the Public Procurement Act, candidate suppliers are asked to confirm their agreement to this, as well as that they are in line in terms of VAT declaration, NSSO on personnel costs, have not committed corruption, etc. This will be done even more explicitly in the future, both as part of the tender specifications and in the contracts that VLIRUOS concludes with suppliers who perform certain tasks on behalf of VLIRUOS;

3.4. Prevention and Risk Assessment

The preventive approach that should help enable acting with integrity is based on several pillars:

3.4.1. HR policy

Integrity as such should be kept alive in the organisation, especially within the VLIRUOS team. Therefore, every person involved should have a good knowledge of what integrity means and what the integrity policy and related procedures entail. It is also essential that everyone feels involved and acts accordingly.

The theme of integrity is integrated into the employee selection procedure. During interviews, the theme of integrity is checked for content. When requesting references, the candidate's integrity is also explicitly assessed. From now on, a recent extract from the criminal record will be requested for inspection before an employment contract is signed with members of the management team and HR and finance functions because of their internal leadership and/or confidential role in the organisation.

- Employees now also sign the code of ethics, in addition to the IT acceptable use policy, and receive the integrity policy document in addition to the employment regulations. This should ensure awareness and commitment.
- During the onboarding of new employees, an explanation of VLIRUOS policies and practices is provided, with a special focus on integrity. This is done by the integrity manager or the complaints manager.
- Efforts are made to raise employee awareness through regular training courses and by visually displaying the core values in the office, so that every employee has the necessary grip on their daily actions, as well as the reflex to address colleagues respectfully in the event of perceptions of non-

integrity. Collective workshops on the integrity policy and experiences with it are provided periodically. Specific training is provided for employees who have a specific role in the integrity policy.

- During development and/or performance interviews with employees, the theme of integrity will be questioned more explicitly from now on. Time will be set aside to share and discuss perceptions of the integrity policy.

3.4.2. Transparency policy

The transparency policy concretises the importance of transparency for the functioning of VLIRUOS and how this is specifically given shape so that the objectives such as generating trust, being compliant, initiating cooperation, realising information sharing and being organisation culturally transparent can be realised on a day-to-day basis. Specifically, it is about access and reliability of information and how we publish and share information within our community.

3.4.3. Crisis communication policy

The crisis communication policy determines the steps to be taken in the context of information sharing and communication in crisis situations, including the occurrence of serious forms of integrity violation within the scope of VLIRUOS.

3.4.4. Grant management

- As part of VLIRUOS' role as grant manager, VLIRUOS employees take into account VLIRUOS' overall risk policy.
- The control of (the implementation of) each project is both substantive and financial. These controls are independent of each other, with each staff member working from his/her own position with pronounced objectivity, independence, neutrality and equal rights. Controls are carried out ex ante, before projects are launched, and during implementation. During implementation, project spending of subsidies is checked in detail. Projects are also given a risk profile based on a number of variables such as country, institution, programme, etc. Evidence can be requested for each part of the project implementation, this to detect possible fraud and abuse.
- Monitoring is done by highly qualified and well-trained staff.
- There is separation of roles within the VLIRUOS team: staff from the finance department and programme hub respectively, although working together, report to other managers. Their perspective in monitoring and reporting is also different, respectively focusing on compliance with regulations and equal rights and appropriateness of deployment of people and resources according to respective project objectives.

3.4.5. Financial policy

- VLIRUOS' financial policy aims to provide sufficient resources for its own operations, programme and project operations, to spend these resources effectively and efficiently, to monitor them objectively and to report on them transparently.
- Part of the financial policy is a risk policy whereby risks are assessed in advance, the probability of their occurrence and preventive and curative measures. In concrete terms, this mainly concerns control and reporting, monitoring and evaluation, and processes based on separation of roles. This mainly focuses on preventing breaches of financial integrity, as well as detecting them more quickly.
- It also deals with who can bind the organisation towards third parties, including by entering into commitments and/or contracts, and who can represent the organisation towards third parties. The Internal Regulations of the UOS Office stipulate that this is the chairman and director together. The Internal Regulations also regulate the power of signature.
- More details can be found in the financial policy of VLIRUOS.

3.5. Violation of integrity and reporting it

All those directly or indirectly involved with VLIRUOS have not only the right but also the duty to express what is perceived as a violation of integrity. By violations we mean both violations of moral integrity (harassment, intimidation, transgressive behaviour, racism, exclusion, physical violence, sexual harassment and abuse, mobbing, extortion, etc.) and financial integrity (fraud, evasion, forgery, money laundering, scams, etc.). For project partners, there is also a third form, violation of scientific integrity. Anything perceived as a violation of integrity should be flagged up and then dealt with systematically and carefully. The code of ethics clearly states this duty to report.

Any report to VLIRUOS must be able to be made in a simple and easily accessible way. To this end, a reporting point was created on the VLIRUOS website. This hotline meets the expectation as stipulated in the Royal Decree of 28/2/2023 to elevate the existing integrity charter on development cooperation to a national standard for integrity policy and to establish a central hotline for victims of abuse in Development Cooperation. With this hotline, anyone involved in any way in the operation of VLIRUOS can safely report what, from his/her perception and experience, is not in line with what integrity should entail and this under the guarantee of an objective, neutral, careful and GDPR-compliant approach from the organisation. (see also point 4.3)

If the reporter is a member of the VLIRUOS team, he/she enjoys protection against dismissal as soon as he/she comes forward. This protection means that one cannot be dismissed on the basis of having made a report. The protection ends six months after the complaint is settled. Abuse of this protection measure necessitates immediate termination of the protection measure. The management will also consider sanctioning the abuse in accordance with the sanctions regulations, as described in the labour regulations.

3.6. Cooperation with other actors

VLIRUOS' radius of action covers two worlds: that of higher education and that of development cooperation. VLIRUOS cooperates closely with the VLIR, in particular with the working groups on integrity embedded in it (e.g. VLIR consultation group on confidential counsellors and the working group on GJU evaluation) and other education umbrella organisations (VLHORA, VLUHR, VLOR, ...), and with the two other actors from our thematic Common Strategic Framework (CSF): ARES and ITG, as well as with VVOB. VLIRUOS is also active within FIABEL and the NGO Federation.

Within its network, VLIRUOS exchanges information around policy and practice, and seeks to improve integrity work and integrity policy within its own organisation and project operations. Where possible, it cooperates with other actors on the theme of integrity.

Various consultation platforms are increasingly focusing on an overall dialogue and action on the theme of integrity. As a member of such platforms, VLIRUOS actively contributes to collective learning and improvement.

4. Roles and responsibilities

4.1. VLIRUOS and the institutions

As previously stated, integrity within the context of implementing VLIRUOS projects is the responsibility of the executing Flemish and local partner institutions. The role of VLIRUOS in this regard is clearly defined.

Complaints or reports relating to external partners collaborating with VLIRUOS are systematically forwarded to the institutions concerned. VLIRUOS will follow up on how the complaint was handled. If useful and with the agreement of the involved parties, VLIRUOS may act as a mediator or facilitator. VLIRUOS typically relies on an external agency for this.

In the following, priority is given to how VLIRUOS has defined roles and responsibilities for implementing the integrity policy at the level of VLIRUOS as an organisation.

4.2. Roles within VLIRUOS

To ensure professional and correct implementation of the integrity policy, three roles have been defined and assigned within the organisation. These roles and their responsibilities are described below.

4.2.1. Complaints Manager

Every report and complaint is received by the Complaints Manager.

The complaints procedure clearly distinguishes between reports and complaints. Someone may make a report without immediately formalising it as a complaint. In such cases, a dialogue is initiated with the reporter to jointly determine if the report should be converted into a formal complaint or if the dialogue itself sufficiently addresses the reporter's concerns or perceptions of integrity breaches, or related questions.

For internal complaints, the Complaints Manager can always refer to the Integrity Advisor, Confidential Advisor, or external prevention advisor of the organisation.

When a complaint arises, the Complaints Manager determines:

- The admissibility of the complaint
- The urgency of the complaint
- The method and timing for the investigation
- Who will be involved in handling the complaint (e.g., questioning, committee composition)

The Complaints Manager ensures neutrality, objectivity, and equality in each complaint handling. They also ensure the reporter's safety, support the reporter if there is a victim, and guarantee privacy compliance (GDPR).

The Complaints Manager documents each complaint and maintains a register of all complaints/reports received.

External complaints are forwarded by the Complaints Manager to the concerned partners, who are also monitored for further follow-up.

Annually, the Complaints Manager compiles a report on all reports and complaints received and submits it to the Integrity Officer.

Drawing from experience and lessons learned, the Complaints Manager proactively proposes improvements to optimise the VLIRUOS integrity policy and practice.

4.2.2. Integrity Advisor

A report or complaint usually first reaches the Complaints Manager, who is also the recipient via the reporting channel. However, expressing reports/complaints can be challenging. Reporting perceived breaches of integrity can trigger resistance concerning personal safety or potential repercussions for alleged perpetrators, colleagues, and the organisation overall. The advisor can play an important role here, helping the reporter decide whether, how, and why the report should be further formalised into a complaint.

Conversely, the Complaints Manager may consult the Integrity Advisor to clarify the nature of the report or complaint further with the reporter.

The Integrity Advisor engages with the reporter, acting as a sparring partner. They remain accessible and maintain discretion unless the issues involve employment or criminal law. In such cases, the advisor must inform the Complaints Manager, who must then take further action.

The Integrity Advisor can also refer internal psychosocial wellbeing complaints to the Confidential Advisor or external prevention advisor.

The advisor freely provides advice on implementing the integrity policy.

4.2.3. Integrity Responsible Manager

The Integrity Responsible Manager, drawing from all possible findings, complaints, discussions, evaluations, and determinations related to integrity, initiates further investigations and seeks improvements in current integrity practices, advised by the Integrity Advisor or Complaints Manager if necessary.

The Integrity Responsible Manager monitors the implementation of the integrity charter and policy, initiating necessary actions and contributing to organisational awareness about integrity.

Annually, the Integrity Responsible Manager prepares the organisation's integrity report, based on input from the Confidential Advisor, Integrity Advisor, and/or Complaints Manager.

External reports and complaints are reported annually to the UOS Bureau.

4.2.4. Confidential Advisor and External Prevention Service

The Confidential Advisor and external prevention service explicitly appointed and active within VLIRUOS are also mentioned among the integrity actors.

The Confidential Advisor plays a crucial role in handling welfare issues, including experiences related to moral integrity breaches. The Confidential Advisor has a supportive role, can mediate directly, or refer to the external service for workplace prevention and protection.

The external service for workplace prevention and protection provides an occupational physician and psychologist (the Psychosocial Wellbeing Prevention Advisor - PAPS) for the VLIRUOS team.

What the Confidential Advisor and external roles mean for staff in terms of integrity is detailed in the workplace regulations, in accordance with wellbeing law (Federal Public Service WASO - Wellbeing Law Title 3: Prevention of psychosocial risks at work).

In practical terms, staff experiencing moral integrity breaches can contact either the Confidential Advisor or external prevention service if they wish.

Conversely, the Integrity Advisor or Complaints Manager can advise reporters to contact the Confidential Advisor or external prevention service.

4.2.5. Joint Responsibilities, Continuity, and Collaboration

Given reporting must always be possible, if one of the three roles is unavailable, another role or the Confidential Advisor may be contacted to handle the report or complaint appropriately.

As mentioned, the three roles may refer reporters to the internal Confidential Advisor or the external psychosocial wellbeing prevention advisor (PAPS). Interventions concerning psychosocial wellbeing complement the integrity policy but follow a distinct procedure outside the scope of this policy.

Backup roles have been established for the Integrity Advisor and Complaints Manager to ensure policy continuity.

Semiannual meetings between roles review integrity policy implementation and complaint handling, initiating policy adjustments when necessary. The Integrity Responsible Manager initiates these meetings.

The management team receives biannual updates from the Integrity Responsible Manager regarding integrity policy-related complaints/reports and actions taken.

5. Reporting Channel and Complaints Procedure

5.1. Integrity Violation hotline

In order to be able to register all possible integrity violations in order to deal with them, a hotline is provided on the VLIRUOS website. This hotline is accessible to everyone and can be used for any content, so that it meets the requirements of a first-line hotline, as stipulated in the Royal Decree of 28/2/2023.

The hotline meets the following criteria:

- The hotline is a starting point for a complaints procedure that guarantees safe, careful, confidential and correct treatment.
- A report is a personal perception of a violation of integrity and in that sense not immediately a complaint.
- All reports can be signalled through the hotline, which therefore also means reports from anyone: any stakeholder, victim of abuse or not. The possibility to report exists for any person, including legal entities or factual groups.
- The hotline is in English, but reports can also be made in Dutch, French or Spanish.
- The hotline is accessible and easy to find on the VLIRUOS website. The hotline is also mentioned in call documents and project contracts.
- The input in the hotline available on the VLIRUOS website (via web portal) creates an email (integrity@vliruos.be) to the complaints manager and his backup. The purpose of reporting via a web portal hotline is to ensure accessibility.
- The mailbox Integrity@vliruos.be is accessible only to the complaints manager, the backup and the integrity officer. Confidentiality is guaranteed.

External parties can only make a report via the hotline.

However, VLIRUOS' own employees can also turn to the confidential advisor, the integrity advisor or the complaints manager to report a moral integrity violation. This can be done through a conversation or an email.

5.2. Complaints Procedure

The complaints procedure makes a clear distinction between notifications and complaints. Someone may come forward with a report without immediately wanting to formalise it as a complaint. In that case, the confidential counsellor or the integrity adviser will enter into conversation with the reporter to determine together whether the report will be converted into a formal complaint, or whether the conversation in itself is already considered sufficient as a response to a feeling or perception of an integrity violation, or questions or concerns about it. However, as soon as the report concerns criminal or employment law matters (both moral and financial), the report will be followed up.

When a reporter formally submits a complaint, **the admissibility of the complaint is considered on the basis of the following criteria:**

- a) The reporter has made himself known. Anonymous reports are in principle not dealt with. The reporter of an anonymous report will be asked to come forward anyway, with a confidentiality guarantee, in order to better contextualise and situate the possible problem so as to be able to reach a solution more quickly.
- b) The complaint concerns recent facts (limitation period = 5 years).
- c) Complaints that have been dealt with in the past and about which no new factual material can be presented will no longer be dealt with.
- d) The complaint does concern a substantive integrity problem, i.e. not a wish or suggestion, not a question or advice.
- e) Financial reports and complaints must be objectively observable (possibly upon further investigation) with clear findings or evidence and preferably also with testimonies.
- f) The complaint directly concerns the operation of the organisation VLIRUOS.

No appeal can be made against complaints that are inadmissible.

Complaint handling meets the following criteria:

- a) The complaint handling takes place in a safe framework, if necessary the necessary protective and safeguarding measures are taken.
- b) The treatment is objective, neutral and based on the principle of equal rights.
- c) In acute emergency situations, the necessary care will be provided (victim support, calling in the occupational physician, IDEWE, etc.).
- d) Treatment takes place within a strictly defined time frame.
- e) Discretion to all parties involved is a condition sine qua non (GDPR).
- f) Every complaint is handled with respect for privacy and a guarantee of confidentiality. The actions of the central hotline are guided by these two principles and particular attention is paid to protecting the identity of the reporter while handling the complaint.
- g) Every complaint is resolved with vigorous measures that are both curative and preventive. The labour regulations are i.c. leading in case of employees.
- h) Important in the context of objective and neutral complaint handling:
- i) Whoever is substantively involved in a complaint is not involved in its handling (vertical delegation). This also applies to whoever has a specific role in the integrity policy.
- j) In concrete terms, the involvement of each intervener will have to be weighed each time. Complaint handling is handled by the back-up or is vertically delegated in case of involvement. When this is so for the integrity officer in charge, referral is made to the President of the UOS Office.
- k) The reporter is informed of the steps taken by the hotline and their outcome.
- l) A report is drawn up on the handling of the complaint, stating the main elements of the file and the steps taken by the central reporting point.

Complaints or reports relating to external partners cooperating with VLIRUOS in the context of VLIRUOS project work are systematically transferred to the institution(s) concerned. In this case, VLIRUOS will follow up how the complaint was handled. If useful and with the agreement of the parties involved, VLIRUOS may act as a mediator or facilitator.

The retention period for complaints and reports is 5 years.

5.3. Schematic View

STEP-BY-STEP-PLAN												
Origin notification	Notification channel		Owner		Criminally or Labor Law		Acceptance		Investigation		measure	reporting
EXTERNAL	reporting point	----	VLIRUOS	----	YES	----	YES	----	YES	----	YES	YES
				----	NO	----	NO	----	YES	----	YES	YES
				----		----	NO	----	STOP			YES
		----	Partner	----	----	----	----	----	----	----	referral and follow-up	YES
INTERNAL	reporting point	----	VLIRUOS	----	YES	----	YES	----	YES	----	YES	YES
	complaints manager	----		----	NO	----	YES	----	YES	----	YES	YES
	integrity advisor	----		----		----	NO	----	STOP			YES
		----	Partner	----	----	----	----	----	----	----	referral and follow-up	YES
	confidant	----	VLIRUOS	----	YES	----	YES	----	YES	----	YES	YES
	External prevention	----		----	NO	----	YES	----	YES	----	YES	YES
	service	----		----		----	NO	----	STOP			YES

6. Relevant Legislation, charters and policy documents

- The Act of 19 March 2013 concerning Belgian Development Cooperation, as amended to date
- The Royal Decree of 11 September 2016 concerning non-governmental cooperation, as amended to date, whereby the Royal Decree of 7 October 2021 allows institutional actors, including VLIRUOS, to start their five-year programmes on 1 September instead of 1 January, and to end them on 31 August instead of 31 December
- Integrity Charter, signed by VLIRUOS in 2018
- Whistleblower Law (2022)
- Royal Decree of 28 February 2023 elevating the existing Integrity Charter on Development Cooperation to a national standard for integrity policy and establishing a central reporting point for victims of abuse in Development Cooperation
- Act of 4 August 1996 concerning the well-being of employees in the performance of their work
- Act of 5 November 2023 introducing provisions and amendments to the Act of 4 August 1996 concerning the well-being of employees in the performance of their work with regard to the designation of confidential advisors
- Codex on well-being at work – Book 1 General Principles – Title 3: prevention of psychosocial risks at work (2024)
- Circular letter Deontological Code BZ2011/6 (2011)
- Act establishing the labour regulations of 1965 (updated text as of 31/07/2023)
- General Data Protection Regulation (GDPR), issued by the European Union (EU) on 25 May 2018

7. Document information and revision-history

Lead	Peter Debroyer
Version number	V3.0
Date of approval or latest update	17 June 2025 (Adjustments following discussions in the Bureau UOS on 28/3/2025 and 16/5/2025, with input from the institutions)
Next review date	December 2025 (reviewed yearly) December 2027 (more indepth review after 3 years)
Associated VLIRUOS policies and frameworks	- Mission-vision-values VLIRUOS - Code of ethics (2024) - Operationalisation of integrity charter (2024) - Transparency policy (2024) - Crisis communication policy (2024) - Gender Policy (2024) - Environmental policy (2024) - Selection system VLIRUOS
Related VLIRUOS procedures	- Integrity Complaints Procedure (2024) - Code of Conduct BUOS members (2020) - Code of Conduct Selection Commission members (2020) - Confirmation of correct conduct of selection commission meeting - IT acceptable use policy - Data processing agreement
Previous versions of this policy	Other codes of conduct: • Code of Conduct for BUOS members (2020) • Code of Conduct for Selection Commission members (2020)