

Integrity Code

This document clearly states the principles of the Integrity Code, also known as the Code of Conduct or Integrity Policy, of Kentalis.

1. Introduction

In our contact with clients and employees, we deal with communication and language on a daily basis. To a large extent, our behaviour determines the quality of the contact and helps to ensure safe guidance and treatment, or a safe school situation for our clients, as well as a transparent and respectful working environment. It's our calling card. That is why in this integrity code we describe what we expect from you as an employee and as a manager.

Clients

When we talk about 'clients' in this integrity code, we mean clients from the healthcare sector and students from the education sector. However, we also refer to the (family) system around the client/student, such as the parents/caretakers or guardians and other client relationships.

Our mission

The integrity code is partly based on the Kentalis strategy in which Expertise, Clarity and Focus determine our direction.

The foundation of everything we do is our Expertise. We combine knowledge from research with the experiences that our professionals, students, clients and their parents and loved ones gain on a daily basis. In this way, our expertise can continue to develop. And we stand out. By Clarity we mean that it is clear to everyone what we do, for whom we do it, where we do it and what effect this has. How? By intertwining our expertise with our way of working. Every day we look at opportunities, but we also look at what can be done better; that is our Focus. We can then choose what we do and what we do not do, or do not do ourselves.

Mutual relationship

Working at Kentalis is about the mutual relationship: it requires something from Kentalis as an employer as well as from you as an employee. Based on our core concepts of Expertise, Clarity and Focus, the seven pillars - of value, knowledge & expertise, appreciation, course & choice, balance, pleasure and responsibility & trust - describe in concrete terms the behaviour we expect from each other (include link with intranet to the map).

Our Integrity Code

Our integrity code states which behaviour is appropriate and inappropriate, so that you can carry out your job carefully and adequately. In doing so, you are aware of your responsibilities and the applicable rules. When rules are missing, unclear, or contradictory, we expect you to judge for yourself and act in a morally responsible manner and to discuss this with your manager. This means you act within generally accepted social and ethical norms, you take responsibility for your own behaviour and you are approachable and accountable.

The integrity code includes the prevention of conflicts of interest. You are clear about your own position when you think there may be a conflict of interest. You handle information with care, especially when this information is personal or sensitive in nature. You keep your appointments and comply with commitments and obligations. From your position or expertise, you inform others about any risks they may run (for example, safety or health risks). You indicate your boundaries when you believe that something is asked or expected of you that, in your judgement, conflicts with your integrity.

If you make a mistake, you report this immediately and you take action to limit damage. You are loyal to the organisation and act in the interests of your position or organisation. We expect employees to be aware of their exemplary role and to handle it with care.

For whom?

The integrity code applies to everyone who works at Kentalis, such as employees, interns, volunteers or employees who are temporarily hired (self-employed, seconded employees, temporary workers, etc.), so that you know how much room you have or do not have :

- in contact with clients;
- in contact with colleagues;
- in relation to the organisation.

The integrity code is part of all agreements relating to the deployment of human resources, such as employment contracts, internship agreements, volunteer agreements, service agreements, etc.

Purpose of the integrity code (integrity policy)

With this integrity code or integrity policy, we pursue the following goals:

- promoting awareness of responsible behaviour;
- protecting against missteps by removing risks or temptations;
- the careful handling of integrity.

2. Integrity code: contact with clients

Communication

Communication is paramount in the contact with clients, all day long. We make use of all methods that allow access to communication, language and information. As an employee, you always tailor communication, both in terms of form and content, to the client as much as possible. You strive to understand the client and to be understood by them.

Duty of confidentiality

You have a duty of confidentiality. Whatever you learn through your job, you are to keep secret, unless laws or regulations require you to disclose it. The duty of confidentiality applies even after your employment is terminated. Functional consultation with colleagues and managers is an exception to this rule.

You handle client information with extreme care, within the legal framework. Information to third parties, both within and outside the organisation, is only given with the consent of the client or his/her representative.

Culture

You work to create a culture where clients and colleagues feel safe. You respect the client's feelings, values, norms and cultural or philosophical views. This does not necessarily mean that you accept all the resulting behaviour, especially when the mission, vision and core values of Kentalis are at stake.

Respect

In your behaviour, appearance and actions, you demonstrate a respectful attitude towards clients, and you act in accordance with the mission, core values and core concepts of Kentalis. Respecting others means treating them the way you yourself like to be treated.

Clothing

You wear clothing that is appropriate for your job and that contributes to a safe and professional working, learning and treatment environment. You take into account that you play a representative role towards the clients of Kentalis.

Touching and physical contact

Physical contact is natural when clients cannot take care of themselves independently or partially independently. In addition, for certain clients, physical contact is sometimes the only form of contact with which they can communicate. You are therefore aware of how the client wants to and is allowed to be touched functionally and professionally. You set a good example when it comes to respectfully dealing with your own and other people's boundaries.

Sexual behaviour

You ensure a safe environment for clients and avoid any semblance of unwanted proximity between you and clients. This means that contact between you and client takes place in the open as much as possible, insofar as the privacy of the client is guaranteed.

You do not respond to or take any initiative with regard to sexual behaviour and/or sexual harassment towards a client. The provision of direct sexual assistance, such as help with masturbation, or the sexual gratification of clients is also inadmissible. If you identify a sexuality-related request for help by the client, you report it to the treatment coordinator or internal supervisor concerned. Engaging in sexual contact is prohibited and has consequences for the continuation of your employment.

Colleagues are obliged to report any suspicion of sexual contact with clients to the supervisor and to report it as an incident in accordance with the reporting protocol (*add Intranet link*) on the Intranet.

Inappropriate and unacceptable behaviour

Kentalis wants to provide a safe environment for all clients and employees. In a safe environment there is no room for (sexual) harassment, aggression, discrimination and bullying. Always take signals from client about discontent and unwanted behaviour seriously and take action, in consultation with those involved. Especially for these situations, Kentalis has appointed contact persons, confidential advisors and complaint officers, whom you can consult for advice and/or assistance.¹

Aggression

You always seek dialogue with the client and use all possible forms of communication to prevent aggression and unsafe situations. However, there are situations and circumstances in which you or other employees are confronted with clients who cannot control their behaviour and aggressive impulses, as part of their communication problems, and thus show expressions of aggression and insecurity. Just because it occurs does not mean it should be considered a natural part of the work.

You will receive guidance (if necessary) in dealing with and handling aggression. It is also possible to receive aftercare. We expect you to be able to deal with expressions of aggression in a professional manner. Violence, including 'educational violence', against clients is never permitted. You refrain from any form of abuse of power, even if in special care situations freedom-restricting measures and other measures according to the Care and Coercion Act (Wzd) are used. The corresponding legal protocol applies to situations like these. Freedom-restricting measures are always applied as lightly as possible and are in principle temporary in nature.

We also want to remain in dialogue with the parents, representatives and visitors of clients. We expect them to behave in a safe manner towards staff, clients and each other and to respect the vision, core values and house rules of Kentalis.

¹ See also: Kentalis Complaint regulations for clients, students and employees

Reporting aggression

Incidents of (verbal) aggression and unsafe situation by clients and/or their family members or visitors are always reported according to the reporting protocol on the Intranet.

Commercial activities

It is not permitted to engage in commercial activities with or for clients. Exceptions must have the express written consent of the manager beforehand.

3. Integrity code: contact with colleagues and manager**Communication**

We strive for an open and accessible dialogue between colleagues and their manager. This means consciously trying to connect and tune into each other's communication. Even if this means using gestures, voice, interpreters, images, adapted meeting technology or otherwise.

Collegiality

Kentalis expects you to work together in a collegial manner. And that you feel involved in Kentalis' policy and working method and that you actively use the opportunity to influence and propagate the policy. We expect you to do your job as well and transparently as possible based on the mission, vision and core values of Kentalis. So you say what you do and do what you say.

Feedback

It is important to be open to feedback from colleagues. Managers and colleagues give each other positive feedback if they are satisfied with each other's behaviour and constructive feedback if they would like to see certain behaviour changed. Giving each other feedback contributes to a transparent working environment and professionalisation of the individual and the organisation.

Inappropriate behaviour

You refrain from undesirable behaviour such as discrimination, bullying, moral, sexual or other types of harassment, aggression and physical or non-physical violence, in word, gesture, image or behaviour. You do not distinguish between persons based on their disability, race, sex, age, skin colour, race, faith and sexual preference. Does inappropriate behaviour still occur? If so, discuss this together first. If this is not possible or does not lead to improvement, report it to your manager. You can also ask the confidential adviser for advice or assistance (this role has been externally placed with the GIMD) or the complaint officer for advice. See the contact details on the Intranet for this.

Violation

If you suspect a (serious) violation of the rules of the integrity code, you are obliged to bring this to the attention of your manager or to the next-level manager if it concerns your own manager. You can also go to the Supervisory Board when the complaint concerns the conduct of the Board of Directors.

4. Integrity code: relation to the organisation**Being a good employer - being a good employee**

Kentalis invests in the relationship with employees. We invest in your professional competence and offer you professional training for continuous development. Together with Kentalis, you take responsibility for your own performance and personal development. Kentalis expects you to comply with legal and company regulations and to act honestly and with integrity.

Company resources

We expect you to handle with care the resources provided by the organisation. In some positions, this also involves company clothing, a company car or a lease car. You do not use company resources privately, unless your manager gives you permission to do so. Upon termination of employment, you will return the provided company resources in good condition.

Intellectual property

To the extent that your function includes the production of certain works of literature, science or art, commissioned by Kentalis, the copyright will automatically accrue to Kentalis. The exception to this is work that does not fall under your duties and within your position. If you want to acquire the copyright yourself, clear agreements must be made in advance with your manager and this will be recorded in writing to each other. It is not permitted to use this work externally without prior consent.

Ancillary activities

Any (ancillary)activities that you undertake outside your work must not harm the function, interests or image of the organisation. Under the Collective Labour Agreement - PO (Article 11.3) and the Collective Labour Agreement - GHZ (Article 3:13), as an employee you have a reporting obligation and you must inform your manager of your ancillary activities or ancillary positions. We put the agreements about any ancillary activity in writing to each other.

No smoking

Kentalis wants to create a healthy environment for clients and employees. Therefore, a smoking ban applies within Kentalis. Smoking is not allowed during working hours. Outside working hours - such as during breaks - smoking is only permitted in areas outside the Kentalis buildings that are specifically designated for this purpose. Smoking is only allowed out of sight of the clients. This smoking policy also applies to the smoking of e-cigarettes and other products similar to smoking.

Alcohol and drugs

It is important that you are optimally able to do your job, with continuity and safety being key. The use of alcohol or drugs (shortly) before or during work is therefore not permitted. If you do come to work under influence, you will be sent away by your manager. It goes without saying that this will be followed up in the form of a disciplinary measure (see the Disciplinary Measures Regulations).

Calamities

We strive for a safe environment for clients and employees. Therefore, in-house emergency response workers are present at each location. They know how to act in cases of evacuations or accidents. In such situations, it is very important to follow the instructions of company emergency workers.

Media

Contacts with the press – either on your own initiative or on the initiative of the press – always take place through the Communication & Relationship Management Department. In crisis situations that can lead to publications in the press, you can contact the Communication & Relationship Management Department via your manager by telephone as a matter of urgency. In any initial contact with the press, never answer substantive questions.

Publications

Do you publish on a topic that is or may be related to Kentalis? Then indicate that you are publishing in a personal capacity. For employees in certain positions (e.g. managers), a person is always seen as an employee of Kentalis, even if they express a private opinion. Depending on your position and place in the organisation, check whether you can publish on your own title. If in doubt, consult your manager.

Social media

Through social media, such as blogs, Facebook, Instagram and forums, we can connect with clients, colleagues and our environment. Kentalis supports open dialogue and the exchange of ideas and knowledge. Do you use social media? If so, Kentalis expects that your expressions will not be harmful to the organisation or our clients. You take the confidentiality of information, the privacy of clients or colleagues and copyrights into account.² It goes without saying that not following up on this will lead to a disciplinary measure (see the Disciplinary Measures Regulations).

² See also: Guidelines for the use of social media are included in the 'Code of Conduct for the use of ICT resources'

Code of Conduct for the use of ICT resources

The 'Code of Conduct for the use of ICT Resources' applies to every employee and, like this Integrity Code, is part of your employment contract. The following topics are discussed in the 'Code of Conduct for the use of ICT Resources':

- handling confidential information;
- access and passwords;
- careful use of ICT resources;
- at your workplace;
- working independently of time, place and device;
- professional online behaviour with integrity;
- WiFi networks;
- reporting incidents and vulnerabilities;
- violations of the Code of Conduct;
- exceptions;
- logging, monitoring and control.

The 'Code of Conduct for the use of ICT Resources' is available in KP&D and via the Intranet (*add link to KP&D*).

Gifts

We want to ensure at all times that the acceptance of attentions, gifts, invitations and offers does not negatively the position and good name of you as an employee or that of Kentalis as an organisation, or that even the appearance of influence arises. Gifts include: all kinds of presents, attentions and gifts, discounts, invitations to non-business activities, events, dinners, free advice, coaching or training courses, etc.

Main rules:

1. The good name and independence of Kentalis should not be compromised. In case of doubt: do not accept!
2. Never accept gifts during an ongoing procurement and/or tendering, sales process and/or when you are in a negotiation process.
3. If you carry out activities for third parties during working hours (e.g. lectures or presentations), you will have the proceeds transferred to Kentalis.

If you carry out activities for third parties during working hours, you may accept a small attention that is in reasonable proportion to the service provided, such as flowers or a bottle of wine. The value of this may be approximately 25 Euro, including VAT. The individual acceptance of money is therefore prohibited. Money or gifts may only be accepted if it benefits Kentalis.

Always use your common sense and be critical of the giver's intention and proceed with caution and restraint when accepting (business) gifts. Be aware of the signal you are sending by accepting a gift. The following questions serve as a guide when accepting gifts:

- Why am I receiving this gift right now?
- Does the giver himself perhaps benefit?
- Does the giver expect something in return from me?
- What is the value of the gift?

The following principles also apply:

- functionality: there must be a business purpose or relationship with the work;
- transparency: there should be open communication about the gift, this could be with your colleagues and/or with your manager;
- independence: no (apparent) dependency relationship or (apparent) conflict of interest may arise;
- proportionality: the gift must be in reasonable proportion to the purpose, such as a good relationship, maintaining and/or sharing knowledge, etc.

What to do?

You notify your manager when you receive a gift, invitation or offer. Personal benefits in the form of offered items (including furniture and food products), concerts, trips and similar may not be accepted. If you have doubts about (the value of) the gift, the intention of the giver or if you feel that there could be (the appearance of) a conflict of interest, always discuss this with your manager. You then decide together whether to accept the gift. If you conclude that the gift cannot be accepted, please inform the provider of this decision with reference to the Kentalis Integrity Code.

Confidentiality

You have a duty of confidentiality. Whatever you learn through your job, you are to keep secret, unless laws or regulations require you to disclose it. Functional consultation with colleagues and managers is an exception to this rule. The duty of confidentiality is included in your employment contract and applies even after termination of your employment.

Report

If you find or suspect that something is not going well, talk to the parties concerned in good time to find a solution. Always report a (suspected) incident through the incident reporting system. You have a duty to report incidents. Your manager is then responsible for taking action on the report. In the event of an incident, all parties involved will be consulted. Both sides of the story will be heard. Openness is paramount, with the aim of finding a workable solution.

If you do not find a solution together, please consult the complaints officer or the confidential adviser (that role is assigned externally to GIMD). If the situation concerns your immediate manager, you can contact the next-level manager or the confidential adviser for advice or assistance (that role is externally assigned to the GIMD) or the complaints officer for advice.

Disciplinary measures

Violation of the integrity code can lead to disciplinary measures such as an official warning or reprimand, which is recorded in the personnel file. There may also be more far-reaching employment action, such as suspension or eventual dismissal. In addition, if there is a criminal offence, the police shall be notified.³

5. Finally

All authorized processes and documents relating to incident reporting, safety, aggression, sexual abuse, confidential adviser, complaints officer, etc. can be found on the Intranet and in KP&D.

6. More information

If, as an employee, you have any questions about the content of these regulations, please contact your manager. Managers can in turn contact the HR Business Partner.

#Tags for KP&D

Complaints procedure for employees, complaints procedure for clients, complaints procedure for education, whistleblower regulation, integrity, ancillary activities, ICT Integrity Code, disciplinary measure, warning, dismissal, incident report

³ See also: Disciplinary Measures Regulations, Employee Complaints Regulations, Kentalis Whistleblower Regulations, Incident Reporting Policy, Declaration Policy.