



Accompanying document on Integrity

Guidance Document *Confidential Integrity Counsellor (CIC)*

This is a document that is used in the Netherlands for working with Confidential Integrity Counsellors.

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1 Introduction

Integrity

Integrity is considered very important at all levels of government in the Netherlands. A host of initiatives are being implemented at both central and local level to promote integrity. The appointment of a Confidential Integrity Counsellor (CIC) is one of these initiatives.

Broad outline of duties

Fleshing out the role of the CIC is a task which confronts many government organisations, particularly following the introduction of the 'Order establishing the procedure to be followed in dealing with a suspected abuse'.¹ This provides outline guidance on the creation of a CIC provision. The CIC generally fulfils two roles. On the one hand, the CIC plays a *sounding board role*, whereby government employees can obtain advice on integrity issues. This involves advising on how to deal with particular ethical or integrity-related issues which the government employee encounters. On the other hand, the CIC plays a *reporting desk role* where government employees can report (their suspicions of) breaches of integrity perpetrated within their own organisation if they do not wish to report it to their superior. The CIC then advises the government employee on the right path to follow, or passes the allegation on - on the employee's behalf and

with their approval - to the appropriate authorities. However, the precise duties, powers and position of the CIC are largely left undefined and are implemented differently from organisation to organisation.

Expert meeting

In spring 2002 an expert meeting for the departmental ICs was organised on the initiative of the General Intelligence and Security Service in collaboration with the Directorate-General for Public Sector Management, both part of the Ministry of the Interior and Kingdom Relations. The aim of this meeting was to exchange knowledge and experiences with regard to fleshing out the CIC role.

Representatives from other government sectors (such as provinces, municipalities and water control authorities) also attended so that they could also benefit from the exchange of knowledge.

Tailored solution

An insight into the various choices which can be made when implementing the CIC role and the associated pros and cons was gained from the findings of this expert meeting, an analysis of (government) documents and the contributions from experts in the field. The insights gained are contained in this Guidance Document. It is not the intention of the Guidance Document that central government should issue detailed instructions as to precisely how an organisation should implement the CIC role. The way in which the role of the CIC is fleshed out needs to be a tailored solution which can differ between ministries or government bodies.

Aim & scope

The decision on how to implement the CIC role can depend on - amongst other things - the size of the organisation, the culture and the ambitions of the management. A 'one size fits all' approach is therefore not appropriate. The Guidance Document serves as inspiration and can help you identify the choices which can be made in implementing the CIC role. The scope of the Guidance Document is not limited to the ministries, but can also meet comparable needs in the other government sectors mentioned above. The Guidance Document is intended both for government organisations which already have a CIC and for those seeking to set up such a provision.

Not a complete solution

Finally it should be stressed that whilst establishing a CIC role is an important measure, it cannot be the only measure to promote the integrity of an organisation. An effective integrity policy consists of a range of integrity tools, of which the CIC is but one. Other ideas in this context might be drawing up a code of conduct, (re-)introducing the oath of office, organising dilemma training, investigating the integrity risks within the organisation² and creating confidential positions. The degree of harmonisation with other measures will, to a large extent, determine the effectiveness of the CIC.

2 Selecting the CIC

Selection by management

In most organisations, the CIC is currently invited to take on the role by the management of the organisation. This means that the CIC position is not opened up to everyone. There is a risk that a CIC who is selected by the management will not enjoy sufficient confidence from the staff in the organisation. The CIC can be seen as the management's creature, more interested in protecting their interests than those of the staff. But a CIC can really only do their work properly if they enjoy the confidence of the staff.

Open selection

There are also organisations where formal applications need to be made for the CIC position. These organisations have drawn up job profiles for this purpose [see 3 Job profile]. The job profile specifies concrete skills and competencies against which the candidate will be assessed. These organisations feel that it is important that the position of CIC is open to all. One benefit of open selection is that staff who formally apply have generally made a well-considered decision and are keen to occupy this specific position.

Consultation/recommendation

Regardless of whether the CIC is chosen by the management or recruited through open selection, it is important that the CIC has the confidence and support of the staff. This can be assured by discussing the appointment of the person concerned with - or submitting it for a recommendation from - the Staff Council. One can also (in a small organisation) ask the staff directly in whom they have confidence, and who they would be inclined to turn to if they were confronted with integrity issues. A personnel consultant, the Security Officer or the staff welfare officer are rarely seen as an obvious CIC. Involving the Staff Council in the appointment of the CIC grants them a certain degree of authority and adds to the confidence that the staff can have in them.

Culture & management

The way in which the CIC is selected - and the way in which the position is fleshed out - is partly dependent on the culture and management of the organisation, and thus situation-dependent. Both factors affect the degree of success of the CIC provision. The selection method, the tasks and powers assigned to them, and the organisational positioning chosen play a major role in determining whether the CIC has support from and enjoys the confidence of the staff. This ultimately also affects the number of allegations that they receive, and the contribution that they can make to promoting the integrity of the organisation.

Window-dressing

An organisation which appoints a CIC but attaches little importance to them in practice, appointing an incapable worker with few powers and without support within the organisation is effectively 'window-dressing'. They are pretending to implement an integrity policy whilst this position is actually implemented in such a way that it can achieve little.

3 Job profile

Skills & personality

To fulfil the role effectively, a CIC needs to have certain specific skills and qualities. Alongside a number of professional qualities, the person's nature - i.e. their character - is at least equally important. Hence the CIC needs to be a sociable, approachable, sincere and authoritative figure who enjoys the confidence of staff but can simultaneously also get on well with the management of the organisation. The CIC must also be able to put things in perspective and soothe the fears and emotions of the complainants.

Experience & network

It is a good idea to appoint a CIC who already has the necessary experience within the organisation concerned and has thus built up an internal network. Familiarity with integrity is naturally a must. An example of a job profile is given below.³ This covers the main skills, qualities and knowledge required.

Skills

- The confidential counsellor has strong communication skills, both verbal and written (can communicate adequately with staff from various levels and specialisms within the organisation).
- The confidential counsellor has an insight into their own actions (demonstrates awareness of how their own behaviour can appear to others).
- The confidential counsellor is able to give advice (is able to identify a problem on the basis of a conversation and to provide clear and understandable advice on that basis).
- The confidential counsellor is able to participate in dialogue (able to actively listen and help a conversation to develop constructively).

Qualities

- Has experience of life and integrity.
- Has a balanced personality.
- Can reflect on their own behaviour and that of others.
- Can handle confidential information.
- Can cope with resistance.
- Is able to adopt an independent position.
- Has an insight into the context within which, and the way in which, unwanted forms of interaction and other improper behaviour occur within an organisation.
- Is approachable / accessible to staff within the organisation.
- The confidential counsellor is able to maintain a professional detachment from the subject under discussion and the person with whom they are speaking, yet at the same time still remains involved.
- The confidential counsellor is open to peer supervision and periodic discussions with colleagues.

Knowledge/ expertise

- The confidential counsellor knows about the individual and group processes involved in unwanted forms of interaction and other improper behaviour.
- The confidential counsellor knows about the organisation's internal structure and culture.

- The confidential counsellor is aware of the 'the social map' (where can information be placed?).
- The confidential counsellor is familiar with relevant legislation and regulations.

4 Appointment & publicising

Clear agreements

When they are appointed, it is important that clear agreements are made between the CIC and the management of the organisation about how long the person concerned will fulfil the CIC role, the position which the CIC occupies within the organisation, and what the rules are. These agreements should not be made afterwards, but at the time of the appointment. It must be clear what duties the CIC has with respect to the management and the complainant. After all, the CIC must be able to indicate clearly right from the start what the employees can expect of them, and what the possibilities and procedures are. In practice such agreements have not always been made at the time of appointment, or have been insufficiently refined.

Full-time or part-time appointment

It is important to recognise that there are certain pros and cons attached to the decision to appoint the CIC full-time or part-time. It has been found in practice that the vast majority of CICs fulfil this role part-time, i.e. alongside a primary position within the same organisation. The disadvantage of this is that this primary position means that the (part-time) CIC feels more dependent on the (senior) management of the organisation because of the influence which they can have over the path of their primary career. That risk arises - for example - if the CIC receives allegations about the personal improper conduct of managers/directors. The advantage of a part-time CIC, on the other hand, is that they are more closely in touch with the organisation and the employees because they are part of the (primary) operational process themselves. A full-time appointment also has pros and cons. The advantage is that they are more independent. The disadvantage is that they run the risk of ending up isolated.

Publicising widely

A Confidential Integrity Counsellor can only have a practical impact if the existence of such a provision is known within the organisation. In the past it has been found that awareness of the CIC provision has been inadequate within some organisations. The CIC must be visible and recognisable. Employees need to be aware that there is a CIC, who it is and what problems they can take to the CIC. The existence of the CIC role must be actively and repeatedly publicised, e.g. via the intranet and (periodic) articles in the staff magazine. It is a good idea to include information about the CIC provisions during the induction process for new employees as well. The CIC must also adopt an active role within the organisation and maintain a good network.

Positive approach

Finally, efforts should be made to ensure that the CIC is not viewed as some kind of 'moral guardian or enforcer' who upholds the formal rules which define the organisation's dos and don'ts. An interpretation or approach to the concept of integrity which focuses on the rules which may not be broken or the prescriptions with which the employees must comply will not contribute to the effectiveness of the CIC. It is particularly important to stress the positive aspects. The communications should constantly emphasise how the CIC can contribute to trustworthiness, loyalty, honesty, responsibility - in other words, to the quality of the organisation.

5 Positioning the CIC & preventing potential conflicts between roles

Easy to approach

It is important that the confidential counsellor is easy to contact and that employees can turn to them readily. The lower the threshold for accessing the CIC, the greater the likelihood that the CIC role will achieve the desired effect. However, in practice it is found that the CIC role is often still occupied by senior officials such as managers and directors. A high threshold CIC role can give the impression - at least to the employees - that the interests of the organisation's management will prevail over those of the employees. This is not desirable from an integrity perspective. Although the seniority of the post which someone occupies is not always entirely determinant of their 'threshold factor' - character and personality are also important aspects, for example - it is generally not a good idea to appoint people who occupy positions which are (too) senior within the organisation.

The disadvantage of a senior official

This particularly plays a role when it comes to raising/daring to raise (apparently) relatively minor matters. The threshold can easily be perceived as being too high for this type of allegation, whilst from a preventative perspective it is particularly important that minor incidents can also be easily raised with the CIC. Experience shows that 'minor' breaches of integrity generally lead to bigger ones - at least if there is no corrective mechanism which comes into operation. Another disadvantage of a senior CIC official is that they generally have a diary which is (too) full, which makes it difficult to be able to clear sufficient space for often tricky or sensitive conversations whereby the complainant generally needs to be reassured somewhat before they are able to tell their story.

The disadvantage of a junior official

The disadvantage of a CIC who is too low down the organisation is that they have less access to the management of the organisation and may have insufficient 'weight' to draw management's attention to allegations or integrity issues. It might also be the case that CIC officials who are (too) junior engender insufficient trust amongst employees in the higher grades.

Types of role conflicts

A CIC can end up entangled in a conflict of roles in various ways. Firstly, allegations may relate to the functional unit within which the CIC also performs their primary work or for which they have managerial responsibility. Employees who work under the CIC may be wary of submitting an allegation to them. Secondly, the CIC may receive allegations about close colleagues, which can also cause tension or role conflicts. Thirdly, it is difficult for a CIC who is also a manager to deal with allegations which they receive about other managers with whom they have to deal on a weekly basis at board meetings or within the management team. Finally, the relationship between a CIC and the senior management of the organisation can also lead to tension, since a CIC with line management responsibility is dependent on senior management in terms of both policy and supervision.

Solutions to role conflicts

Such role conflicts can be prevented in a number of ways. The CIC who also has line management responsibility must - for the sake of objectivity - not be the CIC for the people who work under them. It is also a good idea to appoint multiple CICs within each organisation, which means that CICs do not need to deal with allegations which relate to the operational unit within which they work. Additional benefits of this are that employees then also have a choice of CIC to turn to, and that substitutes are available in the event of illness or holiday.

Legal protection

The CIC is in a vulnerable position with respect to the employer and colleagues. In order to ensure that the confidential counsellor can carry out their work completely independently, they should not have to fear retaliatory measures if - for example - they assist an employee who makes a complaint about improper conduct by his employer. Protection from prejudice as laid down by law for staff councils is therefore required.

Decentralised positioning

In heavily decentralised organisations with parts which operate independently, it is not a good idea to appoint a central confidential counsellor. In such organisations the obvious solution is to appoint a CIC for each business unit.

Central support positioning

Central support departments are generally more suitable for housing a CIC than operational departments, because central support departments are in a non-hierarchical relationship to the complainant. The threshold for reporting incidents is thus lower.

External positioning

Finally a CIC can (also) be appointed from outside the structure of the organisation. Such a CIC is independent of the management of the organisation, which can sometimes boost their objectivity. Such a person could deal with the 'serious' allegations (in the context of the Klokkenuidersregeling). A disadvantage might be that this CIC would be less well-known amongst the employees and their distance from the organisation would raise the threshold.

6 Duties of the CIC

Different duties

Different organisations think differently about the CIC's duties. In one case, the choice has been for a stripped-down CIC role, whereby they merely serve as a sounding board and play no (mediating) role in passing allegations about suspicions of breaches of integrity on to the competent authorities. There are also organisations where the CIC does not treat allegations as confidential, but passes them on to the management on their own initiative. In such organisations they are more likely to be described as an integrity adviser or integrity official rather than a confidential counsellor. However, these are exceptions.

Most important duties

The CIC has a number of duties. The most important are briefly described below:⁴

- **Informing:** the CIC informs the organisation about their role and duties and how they work.
- **Listening:** the CIC is a point of contact and is responsible for the initial contact with employees who have queries relating to integrity issues.
- **Advising:** the CIC advises employees on ethical or integrity issues. This particularly relates to practical dos and don'ts, as well as explaining the applicable law and regulations and any relevant code of conduct in this area. In the case of breaches by others, the CIC advises on the options for communicating the information to the competent authorities. The confidential counsellor can give managers solicited and unsolicited advice about implementing policy within the organisation.
- **Assisting:** the CIC assists and supports the complainant in flagging up suspicions of improper conduct to the competent authorities.
- **Recording and reporting:** all queries and allegations received by confidential counsellors are recorded in a consistent manner. Every year an anonymised report about the nature, seriousness and scope of the allegations will be submitted in a standardised form to the integrity policy co-ordinator, who submits a combined report to the Minister. In addition, each confidential counsellor submits an annual anonymised report to the competent authorities in the unit to which the issue / allegation applies.
- **Monitoring and providing aftercare:** the confidential counsellor provides the complainant with aftercare. The confidential counsellor checks whether the complainant has suffered deleterious consequences in their job as a result of the allegation. The confidential counsellor also monitors how satisfied the complainant in question is with the resolution of the highlighted problem, both by the confidential counsellor themselves and possibly by others in the organisation. The CIC must thereby also inform the complainant about progress and any resolution.
- **Preventing:** if the CIC receives a large number of queries about particular integrity issues, or if it is found as a result of an allegation that a breach of integrity has occurred, it must be possible for people across the organisation to learn from this, and the (integrity) policy will need to be amended accordingly. Anonymised case histories can be used to inform the organisation of what breaches of integrity have taken place, and what steps have been taken against it.

Monitoring role

The CIC's monitoring role has a positive effect. The competent authorities may be more scrupulous about dealing with an allegation if they know that a separately appointed CIC is

watching. If a complainant independently makes an allegation to the competent authorities, it is sensible for them to inform the CIC of this, and then inform the competent authorities of this as well.

Feedback

Someone making an allegation expects it to be taken seriously, and for something to be done with it. The complainant does not need to know all the details, but some feedback and insight into the procedure is required. If there is no feedback, the complainant may think that the issue has been swept under the carpet. Impatience, matters of conscience or personal frustrations may then lead to the complainant becoming a whistleblower and taking his complaint to the press. Whistleblowing generally leads to a negative picture being created, both of the unit in question in particular but also of the entire government machinery. This is why efforts need to be made to raise a complaint internally first, and to call on the organisation's ability to police itself. The CIC thereby plays an important role as a safety valve for the organisation, through which allegations and complaints can be channelled and guided along the correct path.

No CIC investigation

The CIC does not carry out investigations and is not involved in the imposition of sanctions. Investigations and sanctions are the management's responsibility. There is a risk that the CIC will lose the trust of the employees as soon as they also start to investigate breaches of integrity and advise on any steps to be taken. Sooner or later, people will simply stop reporting incidents to them. Although an investigative role is inadvisable, it is part of the CIC's role to probe thoroughly into the nature of the allegation, and it may even be part of their duties to verify the principal aspects of the allegation.

Investigation by senior manager

The actual investigation of alleged breaches of integrity is, in principle, initiated by the senior manager in the department where the breach of integrity occurs. This has its pros and cons. By carrying out the investigation themselves, the senior manager makes it clear that he takes his responsibility seriously. The senior manager also knows his own unit well, which aids the speed of the investigation and limits the risk of the incident or conflict escalating. The disadvantage is that senior managers are not experienced investigators, which means that there is an increased risk of an unprofessional approach in complex cases. There is also the risk that an investigation by the senior manager of his own staff will harm mutual relations and damage trust. One solution to this latter problem might be to have the investigation conducted by another senior manager.

Supervision by (central) management

The (central) management of the organisation must be informed by the senior manager concerned about the investigation, supervises the investigation and monitors progress. Efforts should be made to complete the investigation within eight weeks. The senior manager reports his findings to the central management, which ultimately decides whether the allegation is well-founded and what steps need to be taken.

7 Anonymity & confidentiality

Anonymity in handling

Anonymity and confidentiality are key concepts in the discussion of the CIC's duties and powers. Anonymity relates both to the question of whether the complainant can make their allegation to the CIC anonymously, and whether the CIC can guarantee to protect their source. Confidentiality relates to the question of whether complainant can take the CIC into their confidence, which means in this context that the complainant retains ownership of the problem and can decide whether, when and under what conditions the CIC will raise the allegation formally within the organisation.

Anonymous allegations

Offering the opportunity to make anonymous *allegations* to the CIC is highly inadvisable. This can result in the CIC role becoming a kind of 'tattletale line' where hard-to-trace and unverifiable allegations are dumped. The CIC then has no opportunity to probe in order to establish clearly what the problem is.

Complainant anonymity

Most organisations opt to have the *complainant's* anonymity guaranteed by the CIC. This means that the CIC passes the allegation on to the competent authorities (via the internal structure), without thereby having to reveal the name of the complainant. The advantage of this is that the complainant need have less fear of repercussions from colleagues and with regard to their career. Civil service experience has, after all, shown that whistleblowers often suffer negative effects as a result of making allegations. But if it involves very serious issues or criminal matters, the law may prevent anonymity from being guaranteed. In those cases the whistleblowers scheme applies, which includes the provision that the allegation is recorded in writing with the name of the complainant, and that the relevant competent authorities send an acknowledgement of receipt.

Confidentiality

The Confidential Integrity Counsellor (CIC) is expected to guarantee confidentiality, and therefore only pass on an official complaint to the competent authority at the complainant's express request. However, this creates a dilemma. If there are breaches of integrity, the organisation's interests are at stake, which means that it cannot be possible for the CIC to refrain from drawing the competent authorities' attention to an allegation at the complainant's request. After all, the competent authorities must be able to take responsibility for the integrity of the organisation and take appropriate steps to stop the breach. The CIC must do everything possible to ensure that the competent authorities receive the information needed to stop the breach, so it would appear that from that perspective confidentiality cannot always be guaranteed. However, in practice this has been found to be unworkable. A confidential counsellor who cannot guarantee confidentiality is generally not taken into people's confidence. Organisations must, in principle, try to ensure confidentiality at all times. There are a number of options for the CIC to satisfy the complainant's fears of losing his anonymity and also be able to offer confidentiality:

1. **Urging:** the CIC urges the complainant to report the breach themselves within the organisational structure. It is most desirable if the complainant acts themselves (Anonymity not guaranteed, confidentiality not breached).
2. **Channelling:** The CIC can, at the complainant's express request, pass the allegation on to the competent authorities on the complainant's behalf and in the complainant's name. The competent authorities will send the complainant a confirmation of receipt. This is an option if the complainant is unwilling to overcome the threshold of going to (senior) management themselves. (Anonymity not guaranteed, confidentiality not breached).

- If the complainant informs the CIC of a breach but does not want them to reveal his identity, what then? The CIC does have to act to resolve the problem, since the organisation's interests are primary. There are two options.

3. **Taking over:** The CIC reports the actual breach on the complainant's behalf, at their request, but without giving their name (anonymous) to the management, who send confirmation of receipt to CIC. (Anonymity guaranteed, confidentiality not breached).
4. **Reporting:** The CIC publishes the complainant's case history in anonymised form and in the abstract in their annual report. That means that the seriousness, nature and number of breaches are described without examining specific allegations. Such an annual report will at least give the management a picture of what is going on so that they can implement preventative (integrity) measures without the need to reveal the complainant's name. (Anonymity guaranteed, confidentiality not breached).

8 Number, nature and seriousness of the allegations

Few allegations is suspicious

Practical experience has shown that the number of allegations reported to confidential counsellors varies considerably between organisations. Some CICs get many allegations, others get significantly fewer, and some get virtually none. However, experience does show that breaches of integrity occur within *every* organisation. After all, vulnerable activities are carried out within every organisation. If few or no allegations are made within an organisation, this therefore does not mean that no breaches of integrity are happening there. Receiving only a few allegations is no ground for complacency, but rather for concern: is the CIC well-known enough within the organisation, are they adequately accessible and approachable (low threshold), or is there a very tight-lipped culture within which it is 'not done' to combat improper conduct by raising it as an issue?

Different types of allegations

Alongside the differences in numbers, there is also a wide diversity in the nature of the allegations and the degree of seriousness of the allegations. Comparatively frequently the incidents are minor, but the CIC also receives allegations which raise more serious breaches of integrity. The CIC also plays a role as an advice service with regard to the so-called personal integrity issues. The CIC is also confronted quite frequently with allegations which do not fall within their remit, such as work-related disputes. Work-related disputes (such as disagreements about promotions, internal vacancies or terms of employment) are more usefully addressed to the Staff Council or the Human Resources department. In this regard it is important that the CIC strives for focus in dealing with allegations and thereby restrict themselves to issues which fall within their area of competence. Clear provision of information about the tasks of the CIC prevent them from becoming a sort of repository for all kinds of problems, personal dissatisfactions, irritations and frustrations.

9 Conclusions & recommendations

Diversity in terms of implementation and policy

- The way in which the role of the CIC is fleshed out can vary between government bodies.
- An effective integrity policy consists of a number of integrity tools, of which the CIC is one.

Selection and skills

- Discussing the appointment of the CIC with the Staff Council helps create support for them amongst the employees.
- A CIC must have specific professional and personal qualities.
- A CIC must have the requisite experience and an internal network.

Appointment and publicising

- it is important that clear agreements are made between the CIC and the management of the organisation.
- There are pros and cons associated with opting to appoint the CIC full-time or part-time.
- A CIC only has an effect if they are and remain known within the organisation.
- It is important to stress that the CIC can contribute to the quality of the organisation.

Positioning and conflicts between roles

- It is not advisable to appoint CICs who occupy (very) senior positions within the organisation.
- The disadvantage of a CIC who is (too) low down the organisation is that they may find it difficult to gain access to the management.
- A CIC who also has managerial responsibility cannot be the CIC for the people who work under them.
- It is advisable to appoint a number of CICs within an organisation.
- Protection from prejudice as laid down by law for Staff Councils protects the CIC against sanctions.
- In heavily decentralised organisations the obvious solution is to appoint a CIC for each business unit.
- Central support departments are generally more suitable for containing a CIC than operational departments.
- A CIC can also be appointed external (from the hierarchy of an organisation).

Duties

- If there is no feedback, the complainant may get the impression that the issue has been swept under the carpet.
- The CIC does not carry out investigations and is not involved in the imposition of sanctions.
- Offering the opportunity to make anonymous allegations to the CIC is highly inadvisable.
- Most organisations opt to have the anonymity of the complainant guaranteed by the CIC.
- A CIC who is unwilling or unable to guarantee confidentiality will not be taken into people's confidence.
- Receiving few allegations is no ground for complacency, but rather for concern.
- The CIC should restrict themselves to issues which fall within their area of competence.

¹ You can find a PDF. file of this order via www.integriteitoverheid.nl / Wet- en regelgeving/ Sector rijk/ Order establishing the procedure to be followed in dealing with a suspected abuse.

² You can find a PDF. file with information about a tool that can be applied investigating integrity risks via www.integriteitoverheid.nl / Handreikingen en modellen/ Guidelines for integrity projects part 1.

³ Used at the Dutch Ministry of Transport, Public Works and Water Management.

⁴ They are derived from the Order establishing the procedure to be followed in dealing with a suspected abuse and from the Ministry of Transport, Public Works and Water Management's Confidential Integrity Counsellors protocol.