

IDD Code of Conduct and Key Policies



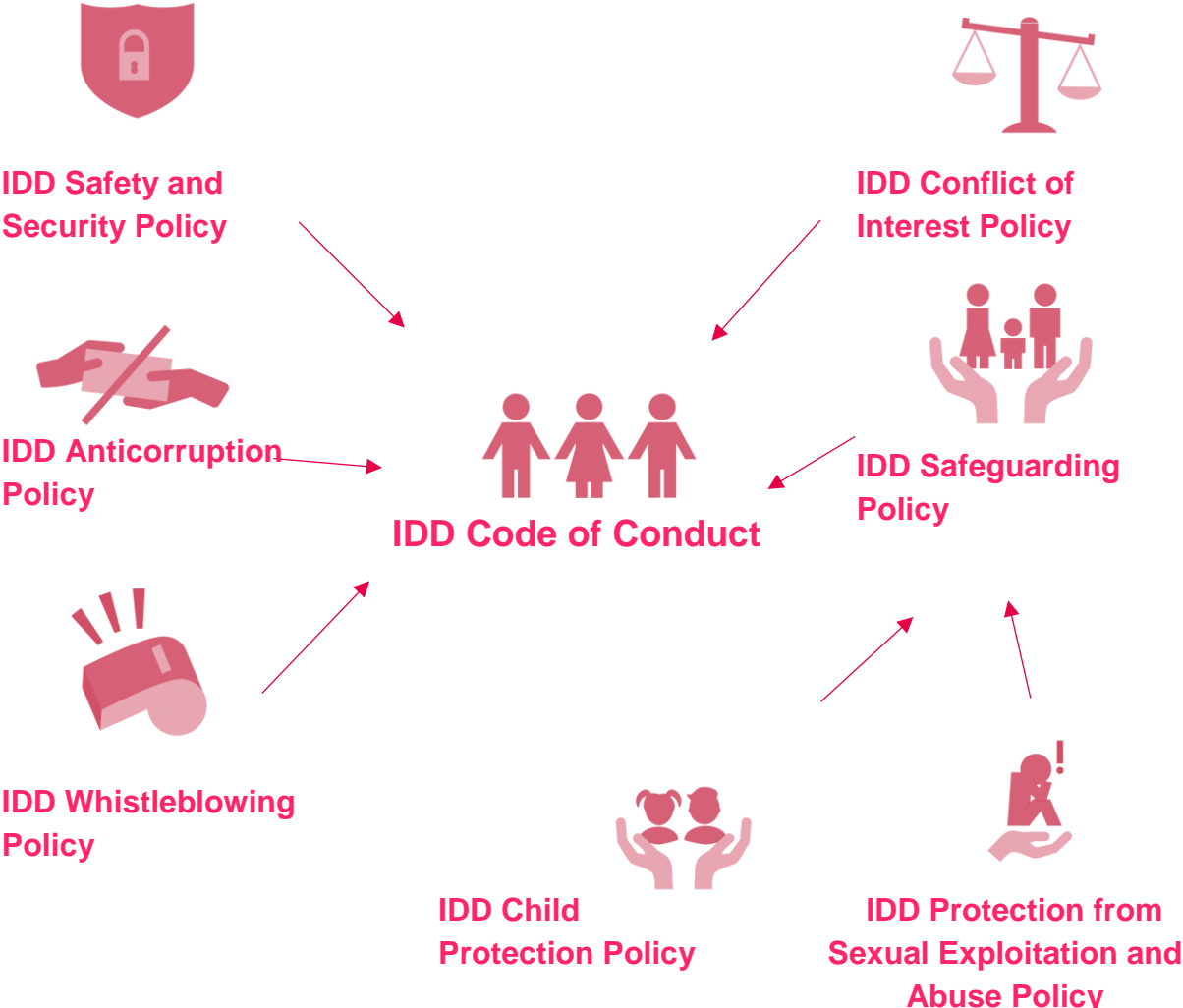
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İnsana
Değer
Derneği

IDD Code of Conduct Scheme

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Introduction

İnsana Değer Derneği (IDD) a non-profit, non-governmental organisation providing emergency relief to people living both inside and outside of Turkey. IDD is committed to the best practice and quality of work of its staff, its partner organisations and other associates. The set of Key IDD Policies presents a detailed guide on the most important standing points, which are essential for our work and map our goals and vision. The IDD Code of Conduct represents the essence of the Key IDD Policies and provides clear guidance on the standards of behaviour required by all IDD staff.

IDD Code of Conduct and all the Key IDD Policies listed below are to be read together.

Unless stated otherwise in the individual policies, the following rules are applicable for the IDD Code of Conduct and the Key IDD Policies.

Applicability

These policies are applicable for IDD, i.e. the *IDD Code of Conduct and Key IDD Policies* are applicable for all full time and part time staff, members of IDD Board of Directors, volunteers, interns, consultants, visitors, people acting on behalf of IDD (further referred to as “IDD staff”) and – to the relevant extent as per the table below – to IDD’s suppliers and partner organizations¹ (further referred to as “IDD associates”), unless stated otherwise within the respective policies. This Code of Conduct and Key IDD Policies are applicable both inside and outside of office hours. The IDD Code of Conduct and Key IDD Policies create an inseparable part of contracts with all IDD’s staff and have to be reflected – to the relevant extent – in all contractual relationships with IDD associates. Understanding and acceptance of these policies is done by signature of contract with IDD and attendance sheets distributed during IDD staff trainings

	Applicability to		
	IDD staff	IDD partner organisations	IDD suppliers
IDD Code of Conduct	Yes	Yes (unless partner organization has its own Code of Conduct in place, containing all key principles)	Key principles are applicable for suppliers in direct contact with IDD beneficiaries.
IDD Safety and Security policy	Yes	No	No
IDD Safeguarding Policy	Yes	Yes, to the relevant extent (adherence to the key principles required)	Yes, to the relevant extent (adherence to the key principles required)
IDD Anticorruption Policy	Yes	Yes (unless partner organization has its own policy in place, containing all the key principles)	Yes, to the relevant extent (key principles to be defined in the contract)
IDD Conflict of Interest Policy	Yes	Yes (unless partner organization has its own policy in place, containing all the key principles)	Yes, to the relevant extent (key principles to be defined in the contract)
IDD Child Protection Policy	Yes	Yes (unless partner organization has its own policy in place, containing all the key principles)	Key principles applicable for suppliers in direct contact with IDD beneficiaries.
IDD Protection from Sexual Exploitation and Abuse Policy	Yes	Yes (unless partner organization has its own policy in place, containing all the key principles)	Key principles applicable for suppliers in direct contact with IDD beneficiaries.
IDD Whistleblowing Policy	Yes	Yes, in situations that directly involve and/or affect IDD	No

¹ In this context, “partner organization” is an entity for which IDD provides financial or other resources, i.e. usually a national or international NGO.

Obligation to report and investigate all breaches

Any known or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behaviour which are in direct breach of the IDD Code of Conduct and the Key IDD Policies must be brought to the attention. The Human Resources (HR) department shall always be informed. The following channels might be used proportionally to the potential severity of the complaint:

Complainant	Type of Complaint / Report	Complaining to	Procedure
IDD beneficiaries	any concerns	IDD senior management	Community Feedback and Response Mechanism for Azaz In person/ Feedback Box/ WhatsApp or Telegram: +905300641621
IDD associate	any concerns	IDD Director	In person/via email: director@idd-tr.org
IDD staff	any concerns	IDD Director	In person/via email: director@idd-tr.org
IDD staff	concerns related to IDD Director	IDD Board of Directors	board@idd-tr.org
IDD staff	specific cases of personal/confidential character, safeguarding complains	IDD Safeguarding Focal point	In person/ via email: safeguarding@idd-tr.org
IDD staff	gross or systematic abuse, criminal activity, severe reputational risks, etc.	IDD senior management	IDD Whistleblowing Policy In person/ via email: fraud@idd-tr.org
IDD staff	serious concerns if other standard routes are inconvenient	External qualified focal point	Email: report@idd-tr.org

Basic principles of investigation

The reaction to a complaint or report shall result in a confidential, sensitive, thorough and prompt investigation. Such an investigation may either result in the reduction of concern or in further action(s) outlined in this document as appropriate.

The subject of the complaint must have an opportunity to explain and/or reply to the allegations before any disciplinary action be taken.

The complainant and the subject of the complaint will be protected against any form of intimidation, threats, reprisal or retaliation resulting from the alleged incident. If any IDD staff member is found intimidating or retaliating against a complainant or a person assisting in an investigation, a disciplinary action - up to and including dismissal - will be imposed.

All information related to the case will be held in strict confidence and might be disclosed only on a need-to-know basis.

Any intentionally false or malicious statements or accusations against another staff member or third party will be considered as gross misconduct.

All concerns about breaches of these standards of conduct expressed either by IDD staff, associates or beneficiaries must be recorded and securely filed.

In the event of an allegation of a criminal offence, the concerned individual should be informed that, in addition to disciplinary action, the case may be reported to appropriate legal authorities for further investigation.

IDD response to breaches

In cases of substantial breaches of the IDD Code of Conduct and Key IDD Policies, IDD will take immediate and appropriate action and will support the needs of those affected. This might include:

IDD full or part-time staff	disciplinary action up to dismissal
IDD volunteers and interns	action up to termination of contract
IDD consultants	termination of contract
Visitors to IDD	action up to suspension of support for the visit
IDD associates	termination of contract
IDD partner organisation	action up to withdrawal of funding or support and/or termination of partnership agreement

Depending on the nature and the circumstances of the case, IDD might involve appropriate authorities to ensure the protection of IDD staff, associates and/or beneficiaries.

Monitoring and review

IDD reviews the implementation of this policy on annual basis to maintain its consistent reflection of good practice, and learning from changing and evolving environment.

IDD Code of Conduct



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IDD Code of Conduct

Applicability

IDD Code of Conduct is fully applicable for all full time and part time IDD staff, volunteers, interns, consultants and people working on behalf of IDD – further referred to as „IDD staff“.

IDD Code of Conduct is as well applicable for IDD partner organizations unless they have their own Code of conduct containing all the key principles of the IDD Code of Conduct. Key principles are also applicable for the IDD suppliers in direct contact with IDD beneficiaries.

Introduction

İnsana Değer Derneği (IDD) is a non-governmental, non-profit organisation providing relief and development assistance worldwide. IDD is committed to the best practice and quality of work of its staff and of its partner organisations. In this context, all IDD staff are obliged to maintain the highest standards in the day-to-day conduct of their work. Any form of exploitation or abuse of power is incompatible with IDD's fundamental belief in the human dignity of all people, and with IDD's core values.

The aim of the IDD Code of Conduct is to provide clear guidance on the standards of behaviour required by all IDD staff. Any unacceptable behaviour breaching this Code may result in disciplinary action, including dismissal. Whilst recognising that laws and cultures differ considerably from one country to another, the Code is based on international legal standards, universal principles of codes of conduct and basic human rights¹.

Complementary documents to be read together with the IDD Code of Conduct are:

- **IDD Safety and Security Policy**
- **IDD Safeguarding Policy**
- **IDD Anticorruption Policy**
- **IDD Conflict of Interest Policy**
- **IDD Child Protection Policy**
- **IDD Protection from Sexual Exploitation and Abuse Policy**
- **IDD Whistleblowing Policy**

Standards of conduct

IDD staff are obliged to avoid any unacceptable behaviour and to comply with the following standards:

Highest standard of personal and professional conduct in line with IDD beliefs, policies, values, mission and vision

All IDD staff must ensure that their behaviour during and outside of work supports IDD's positive reputation. All people have to be treated with respect and dignity. Any forms of discriminative behaviour on the basis of race, gender, religion, social status, colour, national or ethnic origin, age, disability, sexual orientation and others are unacceptable.

The well-being of children has to be promoted across IDD programmes and any behaviour likely to cause harm to children, including physical, sexual, emotional abuse and neglect, is prohibited.

IDD staff have to observe local laws and cultural norms and behave in culturally sensitive manner.

As IDD is impartial, neutral and non-confessional, it is forbidden to take part in political activities or in the promotion of one's religious values in a way that could negatively impact the working goals of the organization or harm the perception of IDD's neutrality.

IDD staff should always use appropriate language, appear and dress in a way corresponding to their position and given situation, creating a respectable and positive perception of IDD.

The possession, distribution or consumption of illegal substances at the work place (including IDD cars) or when on duty is strictly forbidden. Any type of work under the influence of alcohol, drugs or any illegal substance is not acceptable.

No involvement in activities which are illegal or might compromise the work of IDD

Taking part or supporting any illegal or criminal activities is unacceptable.

Abuse or exploitation of children or adults in any way or any activities contravening basic human rights are forbidden.

Any other inappropriate behaviour or action that might jeopardise IDD's reputation must be avoided.

No corruption and no conflicts of interest with IDD work or reputation

No corrupt or fraudulent behaviour is acceptable. Further details are explained in the IDD Anticorruption Policy.

IDD staff may not use his/her working position to achieve personal profit or benefit and have to avoid any situation where personal interests could be in conflict with the interests of IDD. Basic principles and relevant procedures to prevent such situations are outlined in the separate IDD Conflict of Interest Policy.

No sexual exploitation or abuse

Sexual relationship between a IDD staff and a beneficiary is likely to be based on inherently unequal power dynamics and may undermine the credibility of IDD and its work. As such, IDD considers it unacceptable. Sexual relationship with children (persons under the age of 18) is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defense.

The exchange of money, goods, services or favours for sex is unacceptable.

No bullying, harassment, discrimination, intimidation or abuse

Actions of IDD staff should be fair and honest. All people have to be treated with dignity and respect and IDD staff must never engage in any humiliating, degrading or exploitative behaviour.

Any form of physical violence - unless in self-defence – is unacceptable and will lead to immediate dismissal.

The use of inappropriate, violent or offensive language in oral or written form towards others is not acceptable.

Responsibility towards IDD asset, resources or information

IDD staff are expected to use IDD asset, financial and other resources in a responsible and accountable manner, following all relevant IDD policies and procedures.

IDD equipment must not be used for any illegal activity, including any form of harassment, intimidation or degrading activities or comments.

Any entrusted project goods and services must be used in an appropriate manner. Causing damage intentionally or through gross negligence to any property of IDD or to any property directly connected with the work of IDD is unacceptable.

Any private or confidential information related to IDD's work must not be shared outside the organization verbally, in written form, through media, social networks or otherwise, unless legally required to do so.

Responsibility towards one's health, safety and security and of those you manage

IDD staff are required to comply with local security guidelines and act consistently within the IDD Safety and Security Policy.

IDD staff have to behave in ways that avoids unnecessary risks to the health, safety and security of themselves, of their team members, and of those whom they manage. The same attitude must be practiced towards partner organizations and IDD beneficiaries.

Obligation to report all breaches of IDD Code of Conduct

Incidents, concerns or suspicions regarding any breaches of this Code must be brought to the attention of the relevant senior manager.

No false or malicious accusations in relation to the Code are acceptable.

All information about breaches of the Code of Conduct must be handled with the utmost discretion in line with *IDD Whistleblowing Policy*.

Annex I. – Forms of unacceptable behaviour, terminology

Clear definitions are essential for the consistent manner of understanding, categorizing, reporting and responding to individual breaches of IDD Code of Conduct. All forms of behaviour listed below are used in the IDD Safeguarding Policy and in the IDD Code of Conduct as “unacceptable behaviour”.

Abuse

Abuse is a wrong, improper use or treatment of something or someone causing harm, damage, offence or distress. There are several forms of abuse (such as physical abuse, verbal abuse, sexual abuse and emotional abuse), any or all of which may be perpetrated as a result of deliberate intent, negligence or ignorance.

Bullying

Workplace bullying is repeated inappropriate behaviour (verbal, physical or otherwise), conducted by one or more persons against another, which could reasonably be regarded as undermining the individual's right to dignity at work.

An isolated incident of such behaviour may be an affront to dignity at work, but a once-off incident is not considered as bullying. The exercise of legitimate management/employee rights or responsibilities is not bullying.

A pattern of the following behaviours are examples of types of bullying:

- Verbal or written abuse or insults
- Being treated less favourably than colleagues Intrusion – pestering, spying or stalking Menacing behaviour
- Intimidation
- Excessive monitoring of work Humiliation
- Withholding work related information
- Unreasonably changing or manipulating a person's job content and targets Blame for things beyond the person's control
- Manipulation of the victim's reputation by rumour, gossip or ridicule
- Preventing the victim from speaking by making loud voiced criticisms or obscenities Constant undermining, mockery or criticism that focuses on a personal characteristic Exclusion, or victimisation
- Aggressive behaviour towards others, including unreasonable anger or shouting Abuse or threats of abuse
- Persistently manipulating the nature of the work or the ability of the victim to perform the work e.g. by overloading, setting objectives with impossible deadlines, deliberately withholding work information, or setting meaningless or unachievable tasks
- Repeated criticism of work without balancing this with positive feedback where possible or by providing potential solutions
- Criticising an individual's capabilities or her/his personality in front of others

Child abuse

Child abuse and neglect, sometimes also referred to as child maltreatment, is defined as all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust, or power.

Within the broad definition of child maltreatment, five subtypes are distinguished:

- Physical abuse is actual or likely physical injury to a child, such as hitting, kicking or shaking.
- Emotional abuse is harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying or not giving care and affection, resulting in adverse effects on the behaviour and emotional development of a child or young person.
- Neglect occurs when basic needs such as food, warmth and medical care are not met, resulting in the serious impairment of a child's or young person's health or development.
- Sexual abuse occurs if a child or young person is pressurised or forced to take part in any kind of sexual activity. A child cannot consent to any form of sexual activity. Sexual abuse includes incest, rape and

fondling, showing pornography or viewing pornographic images of children. Sexual abuse may involve siblings or other family members, or persons outside the family.

- Commercial or other exploitation of a child refers to the use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labour (minimum acceptable age for employment or work is 15, while for work which might jeopardize the health, safety or moral (so called “worst forms of child labour”) is 18) and child prostitution. These activities are detrimental to the child’s physical or mental health, education, moral or social-emotional development.

Conflict of interest

Conflict of interest is a situation where IDD staff would use their working position or IDD name, logo or reputation to achieve personal profit or benefit. This may occur in the following situations:

- IDD staff, their family members or friends would supply goods or services to IDD, unless undergoing a fair and fully transparent selection process.
- IDD staff would be directly hiring or supervising their family members, bypassing a regular and transparent process.
- IDD beneficiaries would be family members or friends of IDD staff, bypassing a regular process of beneficiaries’ selection.
- Taking loans from IDD beneficiaries

Further details are explained in the *IDD Conflict of Interest Policy*.

Corruption

Corruption is an abuse of the entrusted power for the private advantage of any person. This includes offering, giving, demanding or receiving financial or material gifts, loans, rewards, provisions or any other advantages from/to a third person as incentive to achieve something which is dishonest, illegal or breaching confidence within the framework of contractual relations. This refers in particular to:

- Bribery and the acceptance of bribes, excessive gifts or favours in return for IDD support, goods or services
- Granting and receiving advantages, including return parts of contractual payments (“kickbacks”) Facilitation payments
- Fraud and embezzlement (utilization of the entrusted funds for personal use) Agreements reducing competition
- Extortion and money laundering

Further details are explained in the *IDD Anticorruption Policy*.

Discrimination

Discrimination is an unequal treatment of individuals or groups on the basis of personal characteristics such as disability, appearance and group characteristics, such as ethnicity, religion, etc. Common forms of discrimination may include, but are not limited to, making employment or programming decisions based on family status, race, minority group, gender, religion or lack of religion, colour, national or ethnic origin, citizenship, language, marital status, birth, sexual orientation, age, disability, political conviction, socio-economic background, caste, HIV and AIDS status or other illnesses and physical appearance or lifestyle. Examples of discrimination may include, but are not limited to:

- Programmes not based on proper needs assessment or situational analysis resulting in interventions that benefit men more than women, or vice versa
- Hiring preferences based on one’s religion or ethnic group over members of other denominations or groups
- Stigmatization of or service denial to people on the basis of their HIV and AIDS status Service delivery only to particular ethnic, religious, or political groups

Exploitation

Exploitation means using a position of authority, influence or control over resources, to pressure, force, coerce or manipulate someone to do something against his/her will or interest and wellbeing. This includes threatening to

withhold project assistance, threatening to make false claims about a person in public, or any other negative repercussions in the work-place or community.

Examples of exploitation include, but are not limited to:

- Offering special benefits to beneficiaries or other programme participants in exchange for expressed, implied or demanded favours (including sexual favours) or benefits, either to the staff member or to a third party
- Threats or implications that an individual's refusal or unwillingness to submit to demands will affect the person's entitlement to project assistance and support, or terms and conditions of employment
- Children's involvement in heavy, dangerous, extended long hours or forced labour
- Selling, buying, and transporting children, women or men by means of coercion or deception for economic or other gains

Fraud

Fraud is a theft or misuse of IDD's funds or other resources by a staff member or a third party, which may or may not also involve misstatement of financial documents or records to conceal the theft or misuse. Unacceptable fraudulent and corrupted practices are described in detail in the IDD Anticorruption Policy. Examples of fraud include, but are not limited to, the following:

- Theft of funds or any other IDD property
- Falsification of costs or expenses
- Forgery or alteration of documents
- Destruction or removal of records
- Inappropriate personal use of IDD's assets or funds
- Seeking or accepting cash, gifts or other benefits from third parties in exchange for preferment of the third parties in their dealings with IDD
- Blackmail or extortion
- Paying of excessive prices or fees to third parties with the aim of personal gain

Harassment

Harassment is an unwanted behaviour relating to personal characteristics such as race, membership of a minority group, sex, gender, religion or lack of religion, colour, national or ethnic origin, language, marital status, family status, sexual orientation, age, disability, political conviction, socio-economic background, caste, HIV and AIDS status or other illnesses and, physical appearance or lifestyle which has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment for the person. Such unwanted conduct may consist of acts, requests, spoken words, gestures or the production, display or circulation of texts, pictures or other material.

Harassment also includes the less favourable treatment of a person because he or she has rejected or submitted to the type of conduct described above.

Anyone can be a victim of harassment. Harassment may be an isolated incident or repeated actions. It can take many forms and may involve written documents, the use of IT including email, text messaging, photographs or pictures.

Many forms of behaviour may constitute harassment, including:

- Verbal harassment - jokes, comments, ridicule or songs
- Written harassment - including text messages, emails or notices
- Physical harassment – jostling, shoving or any form of assault
- Intimidating harassment – gestures, posturing or threatening poses
- Visual displays such as posters, emblems or badges
- Isolation or exclusion from social activities
- Pressure to behave in a manner that the individual thinks is inappropriate – for example, being required to dress in a manner unsuited to a person's ethnic or religious background

Trafficking in persons

Trafficking in persons means the recruitment, transportation (including failure to provide return transportation), transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, if

abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Intimidation

Intimidation is the act of willingly making someone timid, filled with fear or frightened into submission. Intimidation implies inducing fear or a sense of inferiority in another person by threats or inducing fear of the consequences against him/her or their family or friends. Acts of intimidation can be verbal, non-verbal or physical.

Modern Slavery

Modern slavery refers to situations where one person has taken away another person's freedom – their freedom to control their body, their freedom to choose to refuse certain work or to stop working – so that they can be exploited. Freedom is taken away by threats, violence, coercion, abuse of power and deception.

Sexual abuse

Sexual abuse is a threat of or actual physical intrusion of a sexual nature, whether by force, coercion or under unequal conditions. It includes sexual assault or sexual acts to which a person has not consented, could not consent, or was compelled to consent.

Sexual exploitation

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power, or trust, to pressure or demand others to provide sexual favours, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of someone else.

Sexual harassment

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature. A single incident may constitute sexual harassment. Many forms of behaviour can constitute sexual harassment, including:

- Physical conduct of a sexual nature, including unwanted contact such as unnecessary touching, patting or IDDDching or brushing against another person's body, assault and coercive sexual intercourse.
- Verbal conduct of a sexual nature. This may include unwelcome sexual advances, propositions or pressure for sexual activity, continued suggestions for social activity outside the workplace after it has been made clear that such suggestions are unwelcome, unwanted or offensive flirtations, suggestive remarks, innuendos or lewd comments.
- Non-verbal conduct of a sexual nature. This may include the display of pornographic or sexually suggestive pictures, objects, written materials, posts on social media, emails or text messages. It may also include leering, whistling or making sexually suggestive gestures.
- Sex-based conduct. This may include conduct that denigrates or ridicules or is intimidating or physically abusive of an employee because of his or her sex, such as derogatory or degrading abuse or insults that are gender-related.

I have read carefully and understood the IDD Code of Conduct and Key Policies and agree to abide by their requirements, and commit to upholding the standards of conduct required.

I understand that failure to comply with any principles of the IDD Code of Conduct and Key Policies may result in disciplinary action up to and including dismissal and, where applicable, may result in civil or criminal proceedings against me.

Name:.....

Signature:

Date:

Organization:

Location:

IDD Safeguarding Policy



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IDD Safeguarding Policy

Introduction

İnsana Değer Derneği (IDD) recognises that especially in situations of poverty, humanitarian crisis and/or conflict, people affected by crisis, children especially, can be extremely vulnerable. At the same time, **safety and well-being of vulnerable children and adults who come into contact with IDD is of our utmost importance**. We therefore acknowledge as our fundamental duty to protect all vulnerable people engaged within our programmes and activities from any forms of abuse and exploitation.

By determining IDD's commitment to protect children and vulnerable people, **this Policy has the following objectives:**

- **To protect beneficiaries (both children and adults)** engaged in IDD's programmes from all forms of abuse and exploitation.
- **To protect IDD staff** from all forms of abuse and exploitation and any potential false or malicious allegations of misconduct.
- **To protect IDD's organisational integrity and reputation**, as well as that of its partners, by introducing sound Safeguarding Policy that helps to understand rights and responsibilities of concerned parties

The policy lays out the commitments made by IDD, and informs staff and associated personnel¹ of their responsibilities in relation to safeguarding.

Expected standards of conduct of IDD staff are elaborated in the *IDD Code of Conduct*, which is an inseparable part of this Policy. The *IDD Code of Conduct* is a key tool for the prevention of all forms of unacceptable behaviour by IDD staff. IDD should also assist partner organisations to reinforce their own existing policies, codes or other instruments or if necessary to develop new ones.

Terminology

Safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect². In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programmes.

This policy is an integral part of IDD Policy package 'Code of Conduct and other Key Policies', therefore please refer to IDD Code of Conduct for all the relevant terminology.

Applicability

The IDD Safeguarding Policy is applicable for all full time and part time IDD Relief and Development department's (RDD) staff, members of IDD Board of Directors, volunteers, interns, consultants, visitors, people acting on behalf of IDD (further referred to as "IDD staff") and – to the relevant extent – to IDD RDD's suppliers and partner organizations³ (further referred to as "IDD associates"), **see IDD Code of Conduct for details**.

Policy statement

All people have the same right to freedom from abuse and exploitation. IDD believes that everyone who come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Therefore, IDD staff and associates must never engage in any forms of humiliating, degrading, abusive, exploitative or other forms of unacceptable behaviour under any circumstances.

¹ See 'Applicability' for definition of associated personnel

² NHS 'What is safeguarding? Easy Read' 2011

³ In this context, "partner organization" is an entity for which IDD provides financial or other resources, i.e. usually a national or international NGO.

IDD commitments

Commitment towards IDD beneficiaries

- In our programmes, IDD is committed to the protection of our beneficiaries. IDD will take all reasonable steps to protect them from any harassment, abuse and exploitation potentially perpetrated by IDD staff or associates. **All IDD staff and associates are thus required to respect the rights and dignity** of individuals, families and communities with whom we work.
- We reject any form of sexual harassment, exploitation and abuse, which we consider as one of the worst manifestations of misconduct and abuse of power. We acknowledge that **certain vulnerable groups** such as children, women, the elderly, disabled people and others might be particularly at risk and **must receive our greatest attention**.
- In order to be able to address the issues of beneficiaries' protection properly, it is essential that IDD staff and associates be **fully aware of and respectful toward local cultural and religious practices**. However, these specifics can never be used as an excuse or a motive for inappropriate behaviour. IDD will not accept using respect for local culture as a justification for ignoring or supporting harmful practices.
- **IDD beneficiaries must be aware of their basic rights and the standards of conduct expected from IDD staff and associates**. A Community Feedback and Response Mechanism (hereinafter CFRM) has to be established in order to enable our beneficiaries to raise any potential concerns.

Commitment towards IDD staff

- **IDD is committed to protecting the rights of the IDD staff** and to maintain its dignified working environment free of any potential harassment, abuse and exploitation. Every IDD staff member must be aware of the internal procedures to raise concerns about any unethical or unacceptable behaviour of her/his colleagues.
- Basic principles and standards of conduct of IDD staff and associates are outlined in the **IDD Code of Conduct**. IDD is aware that substantial breaches of these principles can significantly undermine IDD's core values and vision, and that these would negatively impact on the reputation and ability of IDD to reach its goals.

This policy will further address the following areas of safeguarding: **child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse**. It is to be noted that these key areas of safeguarding are only addressed in this policy and their **more specific aspects are described in different IDD policies and procedures associated with them**, in particular in the Child Protection Policy and Prevention from Sexual Exploitation and Abuse Policy.

IDD commits to addressing safeguarding throughout its work, through the three pillars of **(1) prevention, (2) reporting and (3) response**.

Safeguarding pillars

I. Pillar: Prevention IDD responsibilities

IDD will:

- Ensure **all staff** have access to, are familiar with, and know their responsibilities within this policy
- Implement stringent safeguarding procedures **when recruiting, managing and deploying staff** and associated personnel
- Ensure sufficient **gender-balance** in its office and field teams.
- Ensure staff receive **training on safeguarding** at a level commensurate with their role in the organization
- **Ensure that beneficiaries are selected and benefits are allocated in a transparent way**; and no individual IDD staff member can decide (or is perceived to be deciding) on the benefit allocation as a sole authority.
- **Design and undertake all its programmes and activities in a way that protects** people from any risk of harm that may arise from their coming into contact with IDD. This includes the way in which information

about individuals in our programmes is gathered and communicated. IDD will therefore **make sure that all beneficiaries are**, in an understandable manner and to the relevant extent, **made aware**:

- Of the scope of the assistance they are entitled to, the beneficiary selection criteria, and other necessary details of the assistance
 - That IDD's and/or its partner organisations' staff deliver assistance without discrimination
 - That allocated goods and services cannot be withheld or withdrawn on the arbitrary decision of one individual IDD or IDD partner organization staff member
 - That the assistance is free of charge (unless beneficiaries are formally required to contribute financially) and that it is unacceptable for IDD or its partner organization staff members to accept bribes, rewards, gifts, or any favours (including sexual) from a beneficiary
 - Of the standards of conduct expected from IDD and its partner organization staff members of the existence, purpose and accessibility of the CFRM
- **Follow up on reports of safeguarding concerns promptly and according to due process**

Staff responsibilities

Child safeguarding

- IDD staff and associated personnel must not:
- Engage in sexual activity with anyone under the age of 18 Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking For more details please refer to IDD Child Protection Policy.

Adult safeguarding

- IDD staff and associated personnel must not: Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

Protection from sexual exploitation and abuse

IDD staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance or their immediate relatives, since they are based on inherently unequal power dynamics

For more details please refer to IDD Prevention from Sexual Exploitation and Abuse Policy

Additionally, IDD staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by an IDD staff member or associated personnel to the appropriate staff member

Specifics of IDD partner organizations

Adherence to and compliance – to the relevant extent – with this Policy and the IDD Code of Conduct must be a **condition for every partnership agreement or contract**. In case that a IDD partner organisation does not comply with the principles of this Policy, IDD reserves the right to withdraw funding and/or terminate any existing partnership agreements.

As IDD recognizes that partner organizations might have their own existing policies, codes or other instruments, this Policy and the IDD Code of Conduct does not seek to replace or nullify them. Representatives of partner organisations must ensure that:

- Partner organization staff and associates adhere to the key principles of ethical behaviour and standards of conduct

- All necessary and relevant procedures within their organization are set up and monitored CFRM for beneficiaries is established
- Appropriate actions be taken when the standards of this Policy are not adhered to

II. Pillar: Enabling reports

IDD will ensure that safe, appropriate and accessible means of reporting safeguarding concerns are made available to staff and the communities we work with. And that senior staff members are trained on how to investigate complaints.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected as described in *IDD's Whistleblowing Policy*.

IDD will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report safeguarding concern

IDD strives to create an environment in which victims and persons concerned about the safety feel free to report on it. IDD therefore requests all beneficiaries, IDD staff and associates to report to IDD about any suspicion or disclosure of safeguarding concerns.

- For feedback and complaints that can come from beneficiary communities, IDD has in place a functional **Community Feedback and Response Mechanism (CFRM)**.
- For cases of reporting from IDD staff or associates, utilize the whistleblowing mechanism as described in the *IDD Whistleblowing Policy*.

Staff members who have a complaint or concern relating to safeguarding **can also report it immediately to their Safeguarding Focal Point or line manager**. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may use the reporting channels described above (i.e. CFRM and whistleblowing).⁴

All incidents must be recorded and managed in accordance with the relevant investigation procedures and standards as described in *IDD Investigation guidelines*.

III. Pillar: Response

IDD will follow up safeguarding reports and concerns according to principles and obligations described in the Code of Conduct (*see part Basic principles of investigation*) and other associated policies, in particular IDD Whistleblowing policy, Community Feedback and Response Mechanism (CFRM) and Investigation Policy.

The reaction to a complaint or report shall result in a confidential, sensitive, thorough and prompt investigation. Such an investigation either may result in the reduction of concern or in further action(s) outlined in the IDD Investigation guidelines, which includes disciplinary action up to dismissal and/or reporting to relevant authorities.

IDD will apply appropriate disciplinary measures to staff found in breach of policy in line with IDD Code of Conduct and its chapter **IDD response to breaches**.

IDD will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.⁵

⁴ For more details about channels that might be used for reporting, please refer to IDD Code of Conduct, chapter Obligation to report and investigate all breaches.

⁵ For more more details about IDD response to breaches , please refer to IDD Code of Conduct, chapter IDD response to breaches

Safeguarding principles

IDD observes following safeguarding principles:

- **Empowerment** - people should be supported to make their own decisions based on the best possible information.
- **Prevention** - it is better to act before harm occurs
- **Protection** - those in greatest need require our support and protection.
- **Partnership** - safeguarding is about different people, professions, groups and communities working together to cover all the angles in preventing, detecting and reporting neglect and abuse. Proportionality - what we do should be proportionate to the risk: we don't want to be over-protective if the risk is low, as this in itself can disadvantage people and deprive of them of the opportunity to make their own decisions.
- **Accountability** - as in all our activities, we need to be accountable for what we do in safeguarding.
- **Confidentiality** - It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

IDD Anticorruption Policy



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IDD Anticorruption Policy

Introduction

Insana Değer Derneği (IDD) recognizes that corruption represents one of the major threats for the credibility of non-governmental non-profit organizations in the eyes of beneficiaries, donors and general public, and importantly that corruption might negatively influence the quality of our services. Corruption violates basic rules of healthy competition and brings results that are neither oriented towards public welfare nor functional. In most countries, corruption is legally punishable.

Corruption is in direct contradiction with the principles of transparency, reliability, solidarity, justice and democracy, which are firmly embedded in all IDD activities. Through this Policy IDD reconfirms its commitment to the **zero-tolerance policy towards corruption** and presents the binding guidelines to fight corrupt behaviour, minimize the risk of fraud and other related malpractices.

Terminology

Corruption is defined as the abuse of the entrusted power for private advantage of any person. This includes offering, giving, demanding or receiving financial or material gifts, loans, rewards, provisions or any other advantages from/to a third person as incentive to achieve something, which is dishonest, illegal or breaching confidence within the framework of contractual relations.

Among others, the **following illegal acts count as corruption: bribery and reception of bribes; granting and receiving advantages; extortion; fraud and embezzlement; agreements reducing competition; money laundering; return of a part of a contractual payment (“kickback”); receiving or providing excessive gifts or hospitality; payment of excessive prices or fees to the third parties with the aim of a personal and/or organizational gain; or any other substitutive services by contractors, suppliers, partners, their employees or through public officials.**

Bribery – one of the most common forms of corruption constituting an act of giving money, goods or other forms of recompense to a recipient (usually an official or a person with public/legal duty) in exchange for an alteration of their behaviour.

Facilitation payment – a frequent form of bribe, usually small unofficial payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.

Extortion - an unlawful use of one’s position or office to obtain money through coercion or threats. Excessive gifts and hospitality – gifts and hospitality can range from small gifts (such as diaries) to expensive hospitality (tickets for major events, holidays etc.). Extravagant gifts and hospitality may disguise bribes that are intended to induce corrupt behaviour¹.

Solicitation - the act of a person asking, ordering or enticing someone else to commit bribery or another crime.

Unless it should influence the conclusion of a contract or directly ensure another advantage, the reasonable and justifiable giving or receiving the gifts, hospitality or reimbursement of the expenditures do not constitute corruption.

Standards of conduct in relation to corruption

As stated in the IDD Code of Conduct, no corrupt or fraudulent behaviour is acceptable. IDD staff and associates are therefore obliged to uphold the following rules:

¹ As stated in the IDD Conflict of Interest Policy, IDD defines excessive gifts and hospitality “accepting donations or other forms of benefits in value exceeding 1000 CZK (50 USD or 40 EUR)”.

- Corruption in any form, whether direct or indirect, as defined above, is forbidden. If encountering bribery, the response to all cases should be to reject the demands. Corrupt behaviour through or for the profit of a third party (friends and relatives, partner organization, etc.) is also forbidden.
- Solicitation for a bribe or any other form of corruption is not acceptable.
- Providing contributions to and/or receiving direct or indirect grants or donations from political parties, politically-active organizations or individual persons is prohibited as corrupt behaviour when any advantage is pursued in favour of the donor or third parties. Accepted donations from political parties, politically active organizations or individual persons are to be publicly disclosed in accordance with general rules on disclosure of donations in the Annual Report of the organization.
- Providing information which might create an advantage for a tender participant(s) is forbidden.
- Resources, especially individual financial donations, funds from institutional donors or any other sponsoring services must not be used for corrupt purposes.
- Provision of facilitation payments or giving of any other non-financial incentives with the objective to assure or expedite an official procedure to which the organization has a legitimate right is not acceptable.

The only circumstance where a bribe might not be avoided is a situation where somebody's health or security is seriously at risk. Nevertheless, all IDD operations have to be planned to minimize the risk of payments being requested under duress. At the same time, IDD's no-ransom policy will be respected in a situation of kidnap.

IDD commitments

IDD commits itself to apply the following with the aim to minimize the chances of the corrupt behaviour:

- IDD management actively promotes the message of "zero tolerance towards corruption" and maintains relevant internal procedures and controlling mechanisms to ensure that IDD staff and associates adhere the principles of this Policy.
 - This Policy is disseminated through effective internal and external communication channels and relevant practical training provided to all IDD staff and associates.
 - This Policy creates an inseparable part of all relevant contractual relationships. Disciplinary or contractual sanctions are applied for the violation of this Policy up to the possible termination of the contract.
 - It is clearly communicated that no IDD staff or associate will be disadvantaged when he/she refuses to pay bribes or engage in any other form of corrupt behaviour.
 - All IDD staff and associates are obliged to report any form of corrupt behaviour (including attempted bribes) and any violation or concerns related to this Policy as early as possible. For this purpose, secure, accessible and trustworthy channels of information must be maintained, particularly through the IDD Whistleblowing Policy.
 - All acts of corrupt behaviour (including attempted bribes) are duly recorded and properly and promptly investigated.
 - Partner organizations are appropriately evaluated regarding the adherence to the anticorruption principles prior the commencement of the first joint activities.
- "All goods and services provided by IDD within this project are free of charge. Should a payment or any other compensation be requested in exchange of these goods or services, a senior IDD representative must be informed immediately."*
- Final beneficiaries' selection is based on the transparent set of criteria and IDD staff must ensure that these criteria are observed and that the selection process is free of corruptive practices.

- IDD maintains coherent Procurement guidelines for the fair and transparent use of public and private funds. IDD management at all levels is responsible for adhering to this Policy.
- IDD makes sure that its contractual partners bindingly confirm that they reject corrupt behaviour and have never been legally convicted of fraud or corruption. This applies especially to:
 - Implementation Agreements and other agreements relating to implementation of projects financed by IDD or through IDD by IDD partners
 - Contracts for Work relating to construction and reconstruction where IDD is the order party
 - Contracts of IDD with consultants and freelance persons
 - Further this applies to other agreements if such confirmation should be required considering the circumstances.

The following sentence is added to all above specified contracts:

“The Contractor hereby declares and warrants that the Contractor rejects corrupt, fraudulent, collusive and/or coercive practices and that neither the Contractor nor its management have been convicted of an offence or a crime concerning their professional conduct by a judgment which has the force of res judicata.”

In relation to the Human Resources (HR), IDD management at all levels is responsible for setting up regulations minimizing the risks of corruption, internal nepotism and other forms of possible misuse. This refers mainly to the hiring procedures which should be transparent and based upon the CV, interview, at least two references and relevant testing. Different procedures must be clearly justified.

IDD management ensures that the control mechanisms regularly monitoring the adherence to the above stated principles are in place and that they are periodically updated and reviewed in line with the existing and applicable legislation².

² See the recommended guiding principles for the NGO policies at RESIST (Resisting Extortion and Solicitation in International Transaction), Transparency International, March 21, 2011.

Annex I: List of potential indicators of bribery and corruption

Sample list of potential indicators of bribery and corruption, which may be of assistance in identifying acts of bribery:

- Abnormal cash payments
- Pressure exerted for payments to be made urgently or ahead of schedule
- Payments being made through 3rd party country (e.g. goods or services supplied to country 'A' but payment is being made, usually to shell company in country 'B')
- Abnormally high commission percentage being paid to a particular agency. This may be split into two accounts for the same agent, often in different jurisdictions
- Private meetings with public contractors or companies hoping to tender for contracts Lavish gifts being received
- Individual never takes time off even if ill, or holidays, or insists on dealing with specific contractors him/herself
- Making unexpected or illogical decisions accepting projects or contracts
- Unusually smooth process of cases where the individual does not have the expected level of knowledge or expertise
- Abusing decision process or delegated powers in specific cases
- Agreeing contracts not favourable to the organization either with terms or time period Unexplained preference for certain contractors during tendering period
- Avoidance of independent checks on tendering or contracting processes
- Raising barriers around specific roles or departments which are key in the tendering/contracting process Bypassing normal tendering/ contractors' procedures
- Invoices being agreed in excess of contract without reasonable cause Missing documents or records regarding meetings or decisions Company procedures or guidelines not being followed
- The payment of, or making funds available for, high value expenses or school fees etc. on behalf of others.
- Unusual and/or disproportionate delays from government authorities for otherwise clearly defined procedures – expectation of bribe is likely

Source: Serious Fraud Office

IDD Conflict of Interest Policy



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IDD Conflict of Interest Policy

Introduction

İnsana Değer Derneği (IDD) recognizes that conflict of interest between IDD staff and associates on one side and IDD as organization on the other might negatively influence the organization's performance and reputation and might also lead to various forms of corruptive behaviour. The aim of this Policy is to minimize such risks through clear definitions and examples of conflicts of interest, description of the standards of conduct and related responsibilities.

Terminology

Conflict of interests is a situation in which an impartial and objective performance of working duties or decision making of a IDD staff or associate is jeopardized or challenged by conflict with his/her personal, family, political, economic or other interests.

In other words, conflict of interests is also a situation in which a IDD staff or associate may use her/his working position to achieve personal profit or benefit, in which his/her activities (both at and outside of work) may be in conflict with the interests of the organisation or may place him/her at a disproportional advantage which would be in contradiction to principles of free economic competition.

Standards of conduct in relation to conflict of interest

As stated in the IDD Code of Conduct, IDD staff may not use his/her working position to achieve personal profit or benefit and have to avoid any situation where personal interests could be in conflict with the interests of IDD. Same principle applies to IDD associates.

Conduct forbidden to IDD staff and associates

- Public political or religious activity in which IDD is used as a means of political/religious propaganda
- Participation in activities or membership in organizations, alliances and associations whose focus is in major conflict with the activities, values or good reputation of IDD
- External employment or other forms of activity outside IDD which is in contradiction to the activities, values or good reputation of IDD
- Accepting donations or other forms of benefits in value exceeding 50 USD from partner organizations or business partners of IDD and keeping these for personal use
- Use of confidential information obtained under the working relation with IDD for personal benefit or for the benefit of third persons
- Use of function within IDD or referencing to the function for the purpose of personal benefit
- Preferring members of her/his own family if these are employees of IDD
- Entering sexual relationship with IDD beneficiaries

Forms of conduct or situations which need to be consulted

- Carrying out business activities in areas of IDD operation
- Intimate personal relationships with beneficiaries of IDD assistance or representatives of organizations which are in business relation with IDD

- Membership with organizations, management boards or evaluation committees of donor institutions from who IDD is attempting to apply for funding
- Participation in managing or control bodies of partner organizations Employing own family members
- Ownership, shareholding or membership in a company or business which has a business relationship with IDD (this point applies to family members or close relatives of IDD employees)
- Paid activity (lecturing, training, public speaking) during working hours of the IDD staff member resulting in income exceeding 150 USD/ month

Procedures for resolving conflict of interests

All IDD staff and associates have a duty to primarily avoid entering into any conflict of interest. In case such a situation is or might be likely to happen, every IDD staff or associate has to acknowledge this fact as soon as possible to his/her line manager (or focal person for IDD associates) for further consultation. Failing to do so may result in disciplinary or contractual measures.

Several options are available for mitigation of conflict of interests or mitigation of consequential risks. It is up to the decision of relevant line manager, Board of Directors to choose the adequate means of resolving the given situation.

- **Full removal of conflict of interests** – for example resigning from the managing board of a donor organization, giving up other public activities, not employing family members, etc. In this case, it is not necessary to resolve the situation in the framework of the IDD Conflict of Interests Policy.
- **Refrain from decision-making function** in situations of existing conflict of interests – for example abstaining from voting in a management board of a donor institution during vote related to IDD.
- **Consultation** – in case it is not possible to resolve the situation or condition by removing the conflict or by refraining from decision-making, every IDD staff or associate is obliged to announce such a situation to his/her line manager, who will jointly decide how to proceed in the case. If the conflict of interests is evaluated as serious, it must be reported to IDD Director who will consult with the Board of Directors.
 - Conflict of interest involving IDD employees must be consulted with the IDD Director.
 - Conflict of interest involving members and deputy members of the IDD Executive Committee must be consulted with the IDD Director.
 - Conflict of interest involving the IDD Director must be consulted with the IDD Board of Directors and results reported to the IDD Supervisory Board.
 - If conflict of interests is discussed in the Executive Committee, minutes of the discussion must be recorded and archived as a classified attachment to the Executive Committee meeting minutes.
 - Members of the Board of Directors, IDD Director and heads of IDD offices have to sign an annual declaration of the conflict of interest.
- In case an IDD staff member identifies a conflict of interest concerning another person from IDD staff or associates, it is his/her obligation to report this fact to the relevant head of department or in urgent cases to apply the IDD Whistleblowing Policy.
- In case an IDD staff member is subject to **criminal prosecution**, he/she is obliged to inform her/his line manager immediately.

IDD Child Protection Policy



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IDD Child Protection Policy

İnsana Değer Derneği (IDD) recognizes that especially in situations of poverty, humanitarian crisis and/or conflict, Children can be extremely vulnerable. Therefore, IDD acknowledges as its fundamental duty to protect children engaged within its programmes and activities from any forms of abuse and exploitation. By determining IDD's commitment to protect children and setting the key thresholds of behaviour desired or unacceptable, this Policy has the following objectives:

- To protect children engaged in IDD's programmes from all forms of abuse and exploitation
- To protect IDD staff from false or malicious allegations of misconduct
- To protect IDD's organisational integrity and reputation, as well as that of its partners, by introducing sound Child Protection Policy that helps to deter from unacceptable behaviour

Terminology

Child means person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child. Child protection is an activity or initiative designed to protect children from any form of harm, particularly arising from child abuse or neglect. Child abuse is the physical, sexual, emotional mistreatment or neglect of a child resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. This policy is an integral part of IDD Policy package 'Code of Conduct and other Key Policies', therefore please refer to IDD Code of Conduct for all the relevant definitions.

Applicability

The IDD Child Protection Policy is applicable for all full time and part time IDD Relief and Development department's (RDD) staff, members of IDD Board of Directors, volunteers, interns, consultants, visitors, people acting on behalf of IDD (further referred to as "IDD staff") and – to the relevant extent – to IDD's suppliers and partner organizations¹ (further referred to as "IDD associates"), **see IDD Code of Conduct for details.**

Policy statement and IDD commitments

IDD upholds the rights and obligations of the United Nations Convention on the Rights of the Child² and so is dedicated to protect children engaged in its programmes from harm, exploitation and abuse. Accordingly, IDD is committed to implementing and maintaining child protection measures. These include:

- This Policy is introduced and further accessible to all new IDD staff and associates; regular refresher training is organized for IDD staff directly working with children.
- Analysis of child protection risks is included in IDD projects that involve direct engagement with children.
- Comprehensive child-safe recruitment is in place for personnel directly working with children (see details below).
- Reporting and responding procedures are in place for potential violation of this Policy.

Monitoring and application of this Policy is the responsibility of all IDD staff, particularly the IDD Director, the senior managers and all staff working with children. The management is responsible for the regular policy review and promotion among the target audience.

¹ In this context, "partner organization" is an entity for which IDD provides financial or other resources, i.e. usually a national or international NGO.

² <http://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

Standards of conduct and forms of unacceptable behaviour

Guidance for behaviour that should be observed by IDD staff and associates is described in the *IDD Code of Conduct and other Key IDD Policies*. By keeping in mind that behaviour and actions taken towards children need additional sensitivity, this Policy aims to complement the *IDD Code of Conduct* and highlight behaviour that should be observed and/or avoided **when in direct contact with children**.

Standards of conduct

- Treat children with dignity and respect regardless of ethnicity, race, gender, age, language, religion, political or other opinion, disability, or other status.
- Behave appropriately; make sure that language is moderated in their presence and refrain from adult jokes or comments that may cause discomfort or offence.
- When working in the proximity of children be visible and, wherever possible, ensure presence of another adult.
- **In relation to child labour**, IDD observes the Convention on the Rights of the Child, which stipulates that children's work should not jeopardize any of their other rights, including the right to education, or the right to relaxation and play. At the same time, „*state parties shall provide a minimum age or minimum age for admission to employment*“. IDD Country Programs should therefore act in compliance with the Convention and relevant legislation in the given country.
- While implementing IDD programmes that may affect children, allow them to be engaged in designing the action, listen to them.
- Raise voice (report) when having concerns about child's protection and safety.
- When collecting data from children (during assessments, monitoring and evaluation, etc.) reduce the risk of potential harm by using culturally appropriate ways of communication, obtaining informed consent, ensuring confidentiality and not asking about painful experiences. If distressing data has to be obtained, try to use indirect data collection methods and be prepared to refer the distressed child to professional care.
- When getting and/or using **children's images** for visibility purposes (i.e. photographing or filming a child/children):
 - Comply with the standard approach as explained in the IDD Media Policy
 - Ensure that the products (e.g. photographs, films, videos) present children in a dignified and respectful manner, with children being adequately clothed and not in poses that could be misleading or seen as sexually suggestive
 - When taking an image of a particular child for a specific purpose (medialization, advocacy, fundraising, etc.), explain how the product will be used and for that obtain legitimate consent from the child, whenever possible also from a parent or guardian of the child
 - Ensure that images of children availed for public use do not reveal any identifying information

Forms of unacceptable behaviour

- Touch a child in an inappropriate or culturally insensitive manner (personnel in direct medical care positions are to follow International and/or local country industry best practice guidelines)
- Use language or demonstrate behaviour that is harassing, abusive, demeaning, sexually provocative, or culturally insensitive towards children
- Engage children in any form of activity that is demeaning, offensive, sexually provocative, abusive or culturally inappropriate or insensitive

- Act in ways intended to shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse, discriminate against, show differential treatment, or favour particular children to the exclusion of others.
- Physically assault or punish children
- Engage children in any form of sexual activity or acts, including paying for sexual services or acts or child marriage
- Do things for a child of a personal nature that they can do for themselves E.g. if IDD staff happens to be involved in any dressing, or undressing of outer clothing, or where there is physical contact of lifting or assisting a child to carry out particular activities. In situations with no other option, e.g. when helIDDg a child with disability, these tasks should only be carried out with a full understanding of parents/guardian and of the children involved. There is a need to be responsive to a child's reactions and if a child is fully dependent, talk with them about what is going to be done and give them choices where possible.
- Access child pornography or any inappropriate pictures of children through any medium
- Invite unaccompanied children without their and parent's or guardian's approval into solitary; places, unless they are at immediate risk of injury or in physical danger
- Sleep in close proximity to unsupervised unrelated children
- Hire children for domestic or other labour which is inappropriate given their age or developmental stage and which interferes with their time available for education and recreational activities, or which puts them at risk of injury

Reporting on child abuse

Reporting of and responding to concerns and/or suspicions regarding child abuse within IDD programs is in line with IDD safeguarding policy.

All incidents must be recorded and managed in accordance with the relevant investigation procedures and standards.³

Responding to child abuse allegations

IDD is committed to responding effectively, sensitively and swiftly to all allegations and suspicions of abuse. While IDD takes all allegations of child abuse extremely seriously, at the same time will employ the presumption of innocence while pending an official investigation of the incident. All allegations will be thoroughly investigated. Specific steps that should be reminded and considered while investigating child abuse allegations are:

During the investigation process:

- All efforts will be taken to ensure the confidentiality and rights of the victim and accused person and information related to the incident will only be shared on a "need to know basis", but where allegations will amount to a violation of laws of a respective country, privacy will no longer be applicable unless deemed necessary to uphold the rights of the victim.
- The views of the alleged child victim will be considered in light of the documented evidence and that children rarely lie about abuse.
- The accused person will be always given an opportunity to express their views/opinions/version of the facts.

³ Please refer to IDD Investigation guidelines

- Where appropriate in investigations, IDD will obtain the legal advice and/or advice from any responsible authorities.
- If appropriate (e.g. the incident involves a breach of this Policy), the accused person may be suspended pending an investigation.

All incidents must be recorded and managed in accordance with the relevant investigation procedures and standards.⁴

Where the incident is proven to have occurred:

- Appropriate disciplinary measures will be taken, including, but not limited to: (a) warning; and/or, (b) suspension; and/or (c) dismissal. The disciplinary measure will depend on the nature and severity of the offence.⁵
- Where the allegation involves a violation of either the laws of the country in which the incident occurs, or the laws of the country where the accused person is a citizen, the incident will be immediately reported to the appropriate authorities and the person will be suspended from employment pending an investigation.

Where an allegation is found to be false or unfounded, all efforts will be taken to ensure the rights of the accused person is upheld.

Safe recruitment of personnel working with children

IDD will not knowingly employ or engage in its programmes, and especially in those including regular and direct engagement with children, persons that could pose a risk to children.

In order to fulfil this, **IDD observes following safe recruitment measures:**

- IDD will assess the role subjected to recruitment for the type and frequency of potential contact with children or access to child sensitive data.
- Applicants will be advised of their responsibilities towards children. And for roles that are likely to have contact with children, applicants will be assessed on their awareness of child safeguarding and safe practices.

Candidates applying for positions that **will include regular direct and/or unsupervised work with children** will be – before being appointed by IDD – checked as follows:

- Two verbal reference checks with former employers / professional referees. Applicant's referees shall be specifically asked to provide a view on the candidate's suitability to be working/in contact with children
- IDD will strive to secure criminal record check from prospective candidates. However, it is acknowledged that this is not always possible. In such cases, selected applicants will provide written disclosure regarding whether they haven't been charged with child exploitation offences in the past (see Annex II)
- In projects addressing the child protection and child rights issues, the candidate should preferably have a specific qualification in a childcare, psychological or social field
- For staff and contractors that will not generally have any contact with children (such as HQ based management and support staff), these measures need not be carried out. Should these individuals need to have contact with children as part of their work, they will be subject to the above checks before they can do so. Alternatively, they shall be accompanied at all times during any such infrequent contact by personnel who have been appropriately cleared to work with children and adults at risk

⁴ Please refer to IDD Investigation guidelines

⁵ For more more details about IDD response to breaches , please refer to IDD Code of Conduct, chapter IDD response to breaches

Analysing risks to children in IDD programmes

Prior to commencement of activities involving children, IDD will analyse potential risks to children that can arise as part of the implementation of IDD programmes. These activities can include training attended by children, working in hospitals or schools, data collections including discussions with children etc.

In case risks to children were identified, the project team shall prepare an action plan that will address those risks with the aim to reduce them as much as possible. **In case risks cannot be reduced** to the required level and the project activities would cause harm to children, then the project team shall bring this issue to the country programme management that should decide whether further measures can be taken in order to address the risk(s). **Activities that would harm children must not be carried out.**

Annex I: Disclosure on child exploitation offences

I, signed below, hereby declare that I have never been charged with child exploitation offences.

Name:

Date:

Place:

Signature:

IDD Protection from Sexual Exploitation and Abuse Policy



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IDD Protection from Sexual Exploitation and Abuse Policy

Introduction

Insana Deđer Derneđi (IDD) is a non-governmental, non-profit organisation providing relief and development assistance worldwide. IDD is committed to the best practice and quality of work of its staff, its partner organisations and other associates. IDD also acknowledges as its fundamental duty to protect vulnerable people engaged within its programmes and activities from sexual exploitation and abuse.

Terminology

This policy is an integral part of IDD Policy package 'Code of Conduct and other Key Policies', therefore please refer to IDD Code of Conduct for all the relevant definitions.

Applicability

Insana Deđer Derneđi (hereinafter IDD) Policy on Prevention from Sexual Exploitation and Abuse (**hereinafter PSEA Policy**) is fully applicable for all full time and part time IDD staff, volunteers, interns, consultants and people working on behalf of IDD – further referred to as „IDD staff”.

IDD PSEA Policy is as well applicable for IDD partner organizations unless they have their own PSEA Policy containing all the key principles of the IDD PSEA Policy. Key principles are also applicable for the IDD suppliers in direct contact with IDD beneficiaries.

This IDD PSEA Policy is linked to and must be read together with IDD CoC and IDD Key Policies, especially with IDD Safeguarding and Child Protection Policy.

Policy Statement

Sexual Exploitation and Abuse (hereinafter SEA) are a violation of IDD's Code of Conduct and Safeguarding Policy. IDD does not tolerate any form of sexual exploitation and abuse, as well as bullying and a range of non-sexual abuse of power perpetrated by IDD staff and partners against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin.

IDD commits to do all the needful for preventing its programs having any negative effects such as SEA by IDD staff and partners against beneficiaries and members of the community. IDD takes seriously all the complaints and concerns about sexual exploitation and abuse and it initiates rigours investigation of complaints that indicates a possible violation of this policy, IDD Code of Conduct and other key policies, IDD Safeguarding Policy in particular.

Core Principles

In order to protect the most vulnerable adults and children, and to ensure the integrity of IDD international activities, the following six Core Principles must be adhered to:

- Sexual exploitation and abuse and child abuse by IDD Staff constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defense.

- Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by IDD staff is prohibited. This includes the exchange of assistance that is due to program participants.
- Sexual relationships between IDD Staff and beneficiary is likely to be based on inherently unequal power dynamics and may undermine the credibility of IDD and its work. As such, IDD considers it unacceptable.
- Where a IDD staff develops concerns or suspicions regarding sexual abuse or exploitation and child abuse by a fellow worker, whether in IDD or not, he or she must immediately report such concerns via the established agency reporting mechanisms.
- IDD staff are obliged to create and maintain an environment that prevents sexual exploitation and abuse and child abuse and promotes the implementation of IDD Code of Conduct and related policies. IDD Managers at all levels have particular responsibilities to support and develop systems, which maintain this environment.

IDD Commitments

IDD is dedicated to fulfilling the above stated core principles through the implementation of the following commitments:

➤ To prevent and mitigate the risk of sexual exploitation and abuse by IDD staff:

- Managers and Human Resource team must ensure robust **recruitment screening process** for all the personnel, particularly for person who will have any direct or indirect contact with children¹
- IDD **Code of Conduct** and IDD **Safeguarding Policy** (together with IDD Child Protection and Prevention from Sexual Exploitation and Abuse Policy) is **published, distributed** and **duly known** those who cooperate with IDD.
- **IDD staff receives training** in relation to Code of Conduct, Safeguarding and PSEA and Child Protection in particular. In addition, staff with specific responsibilities (e.g. managers) will receive additional training commensurate with their role.
- **IDD** ensures to have in place **accessible mechanisms for reporting sexual exploitation and abuse** and that IDD focal points for receiving complaints understand how to discharge their duties. This reporting mechanism should not be a separate, parallel system to other complaints and feedback structures in a given area, but rather link to and build on existing structures to create one system for responding to feedback and complaint;
- **IDD engages local communities and governments in prevention and response to sexual exploitation and abuse.** In particular, local communities shall be consulted during development of the Community Feedback and Response Mechanism (CFRM) so that the structure is both culturally and gender-sensitive;
- **IDD** ensures that **when engaging in partnerships, sub-grant or sub-recipient agreements**, these agreements:
 - a) incorporate digest of IDD Key policies (incl. this policy) as an attachment;
 - b) include the appropriate language requiring such contracting entities and
 - c) individuals, and their employees and volunteers to abide with a Code of Conduct that is pursuant to the standards of this Policy; and
 - d) expressly state that the failure of those entities or individuals, as appropriate, to take preventive measures against sexual exploitation and abuse and child abuse, to investigate and report allegations thereof, or to take corrective actions when sexual exploitation or abuse or child abuse has occurred, shall constitute grounds for IDD to terminate such agreements.
- All managers are responsible for **promoting awareness of this policy** within their divisions, individual departments or teams.

➤ **To identify and act upon potential or actual sexual exploitation and abuse by staff in a timely and systematic manner. In order to do so:**

- IDD will **process complaints** of sexual exploitation and abuse in a timely manner, and to **take appropriate disciplinary actions**, including the immediate suspension of the alleged perpetrator from all the activities with a direct impact on beneficiaries and communities until the investigation is ended;
- Upon the agreement with survivor, IDD will **inform the appropriate authority** which is responsible for conducting investigations for sexual exploitation and abuse allegations in respect of national and foreign legislation;
- IDD ensures that **beneficiaries and members of the community know to whom they should report and what sort of assistance they can expect to receive**. All potential and actual survivors of SEA must be fully informed about how the Community Feedback and Response Mechanism (CFRM) works, including the reporting process;
- IDD understands that complainants and survivors have the **right to receive feedback** on the development and outcome of their case and will act accordingly.
- IDD provides **assistance**, psychosocial counselling, medical treatment, legal **assistance to any victims of sexual exploitation and abuse**, perpetrated by one of its staff.
- IDD is responsible to ensure that all the third parties, included partners and suppliers are committed to respect the principles included in the PSEA Policy, in addition to those explained in IDD Code of Conduct and Safeguarding and Child Protection Policy. Their acceptance by signature of a declaration form is a condition for undertaking any relation with IDD. For Partners, in case of missing of its own PSEA Policy, IDD PSEA Policy must be incorporated into the contract and accepted by the Partner.
- IDD ensures oversight and information systems on sexual exploitation and abuse and child abuse reports received and actions taken, in order to monitor effectiveness, report progress and improve efforts to prevent and respond to sexual exploitation and abuse and child abuse.

Roles and Responsibilities

Creating a safe working environment at IDD is everyone's responsibility and failure to act on concerns or disclosures relating to sexual harassment, abuse and exploitation is not an option.

- **IDD senior management** holds overall accountability for this Policy and its implementation.
- **IDD Safeguarding Task Force** is responsible for reviewing and updating this Policy annually, and in line with legislative and organizational developments and hold overall accountability for IDD PSEA work.
- **All staff, volunteers, partners and other representatives of IDD** are required to adhere to this IDD Code of Conduct and other key policies, including SG and PSEA at all times (i.e. including out of office hours).
- **All IDD employees** are obliged to report any suspicions of sexual exploitation, abuse or harassment of others. This can be done without sharing details of cases where information has been shared in confidence. Failure to report suspicion of abuse relating to someone else is a breach of IDD policy, and could lead to disciplinary action being taken. For the avoidance of doubt, there is no obligation placed on any individual to report any incident that has happened to them.
- **IDD Safeguarding Task Forces and senior management** can offer further support to help staff, volunteers and other representatives on implementing this Policy.

Reporting and responding to sexual exploitation and abuse

Reporting of and responding to concerns and/or suspicions regarding SEA within IDD programs is in line with IDD safeguarding policy.

In addition to that special direct line for reporting concerns or suspicions regarding SEA within IDD programs can be used: safeguarding@idd-tr.org.

All incidents must be recorded and managed in accordance with the relevant investigation procedures and standards.¹

¹ Please refer to IDD Investigation Guidelines

IDD Whistleblowing Policy



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IDD Whistleblowing policy

Introduction

All IDD staff have the **Duty to Report** any known or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behaviour, which are in direct breach of the IDD Code of Conduct and the Key IDD Policies. The failure to report any breach of the above-mentioned policies causes the proliferation of dangerous behaviour contrary to IDD principles and values and the victimization of innocent people. All complaints or concerns must be brought to the attention of the relevant persons using the tools and channels described below, such as the email addresses fraud@idd-tr.org (the tool for **reporting fraud**) and report@idd-tr.org (the tool for **reporting any serious complaints when other standard channels were exhausted**). In order to protect the rights of IDD staff and to maintain a dignified working environment free of any potential harassment, abuse and exploitation, IDD management has the **Duty to Investigate** any complaint or concern raised by IDD employees through the channels described below.

Who can raise concern under this policy: full time and part time IDD staff, volunteers, interns, consultants and people working on behalf of IDD – future referred to as “IDD staff”.

What should be reported: any serious concerns or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behaviour, which are in direct breach of the IDD Code of Conduct and the Key IDD Policies or that:

- make you feel uncomfortable in terms of known standards;
- are not in keeping with IDD policies;
- fall below established standards of practice; or
- are improper behaviour.

The above mentioned might relate to:

- conduct which is an offence or a breach of law or IDD policies; o racial, sexual, disability or other discrimination;
- possible fraud or corruption or misuse of finances;
- damage to the security, safety, health or environment; o grievance, bullying, harassment;
- other unethical behaviour;
- attempts to conceal with any of these. This list is not exhaustive.

Basic principles

Confidentiality

IDD treats all complaints or disclosures in a confidential and sensitive manner. The identity of the complainant is kept confidential as long as it does not hinder the investigation process. Consequently, this Policy encourages individuals to put their name under any complaint or disclosure. As the anonymous complaints or disclosures are less credible, the standard procedure cannot be fully followed.

Protection

If the complainant makes an allegation in good faith, which is not confirmed by the subsequent investigation, no action will be taken. However, if he/she makes an intentionally malicious or false accusation or otherwise misuses the channels described below, he/she will face disciplinary action.

The complainant, the subject of the complaint and any other person assisting the investigation will be protected against any form of intimidation, threats, reprisal or retaliation resulting from the alleged incident. If any IDD staff member is found intimidating them, a disciplinary action - up to and including dismissal - will be imposed.

Due process

The rights of all parties involved in an internal administrative investigation will be respected and they will be at all times treated with **respect and dignity**. All employees who are the subject of an investigation will be given:

- full notice of any formal allegation made against them
- the explanation of the investigation process
- the opportunity to explain and/or reply to any formal allegation made against them before any disciplinary action will be taken
- the presumption of innocence throughout the investigation
- the right to a full, fair, impartial, thorough and objective investigation of the allegation(s) without undue delay
- confidentiality in the conduct of the investigation

Any intentionally false or malicious statements or accusations against another staff member or third party, a lack of cooperation (including breach of confidentiality) or an undue interference with the investigation will be considered as gross misconduct and will result in disciplinary or other appropriate action.

Duty to report

As enshrined in the IDD Code of Conduct, IDD staff has the obligation to report all breaches of IDD Code of Conduct and Key policies. Complaints should be reported through the channels described below. IDD welcomes feedback and will treat all complaints and disclosures confidentially, seriously and promptly.

Disclosure channels for IDD employees

1. Standard disclosure channel

All complaints and disclosures should be addressed to the line manager of the person submitting the complaint.

In case the complaint or disclosure of a malpractice does not originate from IDD staff (i.e. coming from IDD associate, IDD partner etc.), **the IDD staff member receiving the complaint is obliged to act as the complainant and the information must be passed as soon as possible to his/her line manager¹** (one of the line managers he/she trusts). Such information must not be intentionally concealed.

If the Complainant is unable to read or write, the line manager receiving the complaint will take notes during the verbal complaint and read the notes back to the Complainant. The Complainant will then be asked to put a finger print to indicate their signature. The line manager will also ask an independent observer² to witness and sign the complaint to indicate that it is an accurate record of the complaint.

2. Whistleblowing principle and disclosure channel

The complaints concerning the line manager of the complainant should be directed to the higher-rank manager. If the higher rank manager can not be contacted, other available reporting channels shall be used.

In line with IDD's open-door approach and the effort to solve – rather than to conceal – different forms of unacceptable behaviour, whistleblowing is seen as an act of personal courage based on loyalty to the organization and its ethical principles. It is expected that IDD staff will use the whistleblowing principle prior to the possible airing of their complaints outside IDD.

¹ Line manager = the person with direct managerial responsibility for a particular employee according to Organigram

² The observer will be any IDD employee not involved in the investigation process, randomly chosen.

3. 'Sexual exploitation and abuse disclosure channel'

If the complaint concerns Sexual exploitation and abuse (SEA), a female/male manager should be consulted, as it would be appropriate considering the complainant sex, even if it is not her/his line manager or, if present, to the SEA focal point.

4. 'Fraud' disclosure channel

Any complaint and disclosure regarding fraud should be sent to fraud@idd-tr.org. This channel, linking employees directly to the Senior management team at the HQ facilitates the detection of financial mal practice, which, if occurred, might prejudice IDD or any of its stakeholders. The preferred language of communication is English or Turkish, but it is possible to submit complaints in any language.

The Senior management team will decide on the merits of the complaint/disclosure.

5. Exceptional disclosure channel

If other standard routes are inconvenient, non-applicable or were exhausted, concerns regarding serious internal cases of unethical, dangerous or illegal practices should be sent to report@idd-tr.org. This channel, linking employees directly to outsourced focal point for such cases who facilitates and accelerates the detection of the types of behaviour, which, if occurred, might prejudice IDD or any of its stakeholders. The preferred language of communication is English, but it is possible to submit complaints in any language.

6. Suggestions / complaints box

If the person who wants to make a suggestion or a complaint considers the above-mentioned channels inadequate, he/she can use the locked box located in each IDD office placed in an area where those who wish to access it can do so as confidentially or privately as possible. The IDD staff will be announced via email about the location of the box.

The suggestions / complaints box will be opened monthly by 2 employees of IDD senior management. Each month, after the box has been opened, one of the employees will complete the Logbook (see Annex 1).

The Head of Operations will keep evidence of the Logbook.

If any suggestions /complaints complete the **Suggestions box form –Annex 3**. This form will also be available next to the box.

All employees who will open the box will sign a Confidentiality Pledge (Annex 2).

When you are not sure about the nature of the problem or it is a combination of the above, seek advice from your LM, another senior manager or report it by sending an e-mail to report@idd-tr.org

Disclosure channel for IDD beneficiaries

IDD acknowledges that enabling beneficiaries and project stakeholders to seek and receive response for grievances and alleged harm is a critical aspect of accountability. Thus, IDD beneficiaries are encouraged to share their complaints, comments and feedback through the outsourced Community Feedback and Response Mechanism (CFRM). This formal mechanism, described in the CFRM policy, provides a safe, accessible and effective channel for IDD's beneficiaries and project stakeholders to raise complaints and feedback and for a response or redress to be given and enables IDD to understand the project from the beneficiaries' perspective.

Duty to investigate

IDD country management and the Senior management team in Prague are responsible for responding to any complaint addressed to them through the above-mentioned channels. Their reaction to a complaint shall result in a confidential, sensitive, thorough and prompt internal administrative investigation, respecting the principles described in this policy. **All IDD employees must cooperate fully and in good faith with an internal administrative investigation.**

The scope of the internal administrative investigation

The internal administrative investigation will be conducted in cases of allegations including, but not limited to:

- Financial malpractice, corruption or fraud
- Failure to comply with legal obligations or statutes
- Dangers to the health, safety, security or the environment □□Grievance, Bullying, Harassment
- Sexual exploitation and abuse
- Criminal activity
- Improper, unethical or unacceptable behaviour in conflict with the IDD Code of Conduct and other policies on the organizational or department level
- Attempts to conceal any of these

This list is not exhaustive.

Once a complaint is received through any of the above-mentioned channels, the provisions of the Investigation Guidelines should be followed.

It should be noted that the internal administrative investigation does not substitute a criminal investigation. In any case in which a crime appears to have been committed, consideration will be given to informing national authorities.

IDD response to breaches

In cases of substantial breaches of the IDD Code of Conduct and Key IDD Policies, IDD will take immediate and appropriate action and will support the needs of those affected. This might include:

IDD full or part-time staff	disciplinary action up to dismissal
IDD volunteers and interns	action up to termination of contract
IDD consultants	termination of contract
Visitors to IDD	action up to suspension of support for the visit
IDD associates	termination of contract
IDD partner organisation	action up to withdrawal of funding or support and/or termination of partnership agreement

Depending on the nature and the circumstances of the case, IDD might involve appropriate authorities to ensure the protection of IDD staff, associates and/or beneficiaries.

Annex 1: Suggestions / complaints box Logbook

No.	Opening date	Names of HR staff who opened the box	Content / details

Annex 2: Pledge of Confidentiality template

I agree to exercise the utmost discretion with regard to my involvement in Suggestions / Complaints box from HQ level. I shall hold secret all information known to me because of my involvement in opening and managing the content of the Suggestions / Complaints box and I will not discuss any information gained in this process with anyone other than the persons who are authorized to receive it.

I understand that this declaration will remain in force after my involvement in the process is complete. I also understand that divulging confidential information to persons who are not authorized to receive it may amount to misconduct and that the signed original of this declaration will be held in the relevant file.

Name _____

Title _____

Signature: _____

Date and place: _____

Annex 3: Suggestions box form

Date:	
Full name (optional):	
Person or program which the suggestion, feedback or complaint is related to:	
<p>Your complaint</p> <p>(include as much detail as you can. Please write on the back of this paper if you would like to include more detail):</p>	
<p>Do you have any evidence to sustain this?</p> <p>(if yes, please mention it here):</p>	
<p>Would you like a response?</p> <p>(if yes, please provide your contact details. You can choose to remain anonymous, but it might limit our ability to investigate)</p>	<p>Full name:</p> <p>Contact details:</p>

IDD Safety and Security Policy



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IDD Safety and Security Policy

Applicability

The IDD Safety and Security Policy is applicable for all full time and part time IDD staff, volunteers, interns, consultants, visitors, people working on behalf of IDD (further referred to as "IDD staff"). The policy is not applicable for IDD associates, i.e. partner organizations and suppliers.

Introduction

İnsana Değer Derneği (IDD) is committed to minimising safety and security risks to all its staff and ensuring that staff members are given training, guidance, technical support and information to reduce their risk exposure while maximizing the impact of our programmes. IDD seeks to provide safe and healthy working conditions for all staff, mindful that each individual staff member also has a responsibility for achieving this. Particularly in volatile, high risk environments, IDD management decisions are guided by the principle that addressing security concerns and minimizing the risks to its staff are paramount over any other considerations.

At the same time, IDD remains committed to minimising any potential negative impacts of our actions on our beneficiaries. Basic principles of Do no harm shall be followed at all times.

Key security strategies and principles

IDD recognizes three key security strategies:

- **Acceptance and integration into community**

Acceptance of our beneficiaries and in the communities where we work is the cornerstone of effective security management. It is, to a great extent, best assured when IDD and staff are well integrated into the local community and valued for their contributions to local development and/or humanitarian relief. IDD's overall approach, programme design and staff behaviour will be based on the acceptance approach and principles of transparency, accountability, respect and participation towards beneficiaries, local authorities, partner organizations and other stakeholders. Particularly in conflict settings, adherence to the key humanitarian principles formulated in the Red Cross Code of Conduct is essential.

- **Protection measures**

While the acceptance approach provides a foundation for effective security management, it cannot fully address all security threats. In a volatile environment, relevant protection measures (such as unarmed guards, secured offices and guesthouses, and improved communication equipment) should be implemented.

- **Deterrence as a last resort**

In extremely high-risk environments, deterrence measures (such as armed guards or suspension of activities) can

Key related principles are as follows:

- **No involvement with the armed forces**

Engagement with any local or international armed forces is strongly discouraged and has to be limited to essential humanitarian coordination/action only.

- **Priority to human life**

IDD recognizes the primacy of life over any asset and therefore no staff member should endanger her/his own life, or the lives of others, while attempting to protect IDD property, equipment, financial resources, documents or infrastructure.

- **Proportionality of the risks**

The achievable impact of our activities should always outweigh the risks taken. This ratio has to be continuously monitored and re-assessed particularly when designing programmes in new countries and regions, or during significant changes to local security dynamics. Operations where the security risks are disproportionate to the potential programme benefits shall be avoided or suspended. Potentially life-threatening activities will be undertaken exclusively if the impact will likely save beneficiaries' lives.

- **Precaution**

The decision to evacuate, withdraw or forbid a field trip can be initiated at any management level and will always be endorsed by the higher management level(s). Such a decision can be over-ruled only in a situation where evacuation or withdrawal would entail significantly higher risks than hibernation.

- **Right to decline**

IDD staff shall always be beforehand informed of and prepared for the level of risks of any given mission and by accepting the mission, they accept the risk. However, IDD staff members have the right to decline deployment, activity or travel without suffering disciplinary action if they feel the risk to their personal security or that of their immediate family is unacceptable.

Roles and responsibilities

Senior management roles and responsibilities

- **Duty of care**

The effective safety and security management is the primary function of IDD senior management. Management at each level of the organization is responsible and accountable for ensuring that organizational duty of care towards its staff members and IDD Safety and Security Policies, standards, plans and procedures are well integrated in all stages of planning, designing, developing and implementing IDD programmes.

- **Integration of security management into programme management**

Safety and security management must be fully integrated into the programme design, management and decision making process and not be seen as a separate function. Managing safety and security is fundamentally about good programme management. The types of programmes IDD undertakes and the way in which they are implemented will affect, and be affected by, the risks to which IDD staff, beneficiaries, and partners are exposed.

- **Preparation of Security Management Plan (SMP)**

The security situation, trends, risks and threat levels in the countries of IDD operations will always be monitored and documented as these can greatly affect the strategic planning process. IDD management is committed to assigning the adequate strategies and procedures in place to mitigate the identified risks and threats. Based upon a detailed risk assessment, SMP must include specific risk mitigation measures and plans; safety and security procedures; and roles and responsibilities of assigned staff.

- **Information about the risks**

IDD management has to ensure that all staff is duly informed about and accepting of existing risks and has sufficient awareness about risk-mitigation strategies. The Risk Assessment Matrix (RAM) has to be communicated to all staff members as part of their induction.

- **Provision of training**

Training, learning opportunities, necessary resources and support will be provided by IDD to all staff members so that they can fulfil their assigned responsibilities and work effectively and safely in their respective areas of operation.

- **Adequate staffing and division of responsibilities**

IDD Director have the ultimate responsibility for the implementation of security related issues. In significantly volatile or complex environments, IDD will make an effort to recruit a dedicated country level Security Officer,

while in every office a Security Focal Point will be appointed. Security Officers and Security Focal Points will monitor and advise on safety and security risks, develop and apply security procedures and assist in integrating safety and security measures into programme operations. At IDD headquarters, RDD management supervises the Security Advisor(s) who maintain an advisory role and have no managerial responsibilities.

- **Adequate budgeting**

Adequate budgeting for safety and security management will be allocated by IDD management. All funding proposals in high-risk countries should include a budget for safety and security as most of the major donors will not only approve but expect to find adequate budgeting for safety and security measures.

Staff roles and responsibilities

- **Security is everyone's job and concern**

IDD staff shall actively participate in, contribute to and adhere to the maintenance of safety and security measures, awareness of security risks and team security. IDD staff shall provide reasonable support to the safety and security of our implementing partners and beneficiaries and coordinate with other humanitarian actors.

- **Impact of individual action**

All IDD staff are responsible for their own safety and security and should exercise common sense to ensure both. Simultaneously, IDD staff are not only responsible for the impact of their actions on themselves, but also on the safety and security of their fellow staff, beneficiaries, IDD programmes, reputation and assets, and in some cases on other humanitarian actors.

- **Respecting IDD Code of Conduct and local culture**

IDD staff will always act according to the principles formulated in the IDD Code of Conduct. IDD staff will also strive to understand the local culture and behave in a manner that is respectful of its cultural norms, as their breaches might often increase their or the organization's exposure to threats.

- **All security incidents must be reported**

All staff are responsible for reporting any security incidents, near misses, threats and significant developments to the relevant management level as soon as reasonably possible. Even a seemingly insignificant threat should not be underestimated.

- **Compliance with the security procedures**

Compliance with the security procedures is compulsory. Disregarding the security protocol might jeopardize not only the personal safety, but the safety of the whole team. It may increase the risk of harm to staff, IDD assets and may reduce acceptance of IDD by host governments, communities and beneficiaries. A serious breach of the IDD Safety and Security Policy and protocols might lead to severe disciplinary measures, including immediate dismissal.

- **Adequate staff induction**

All IDD staff will have access and orientate themselves to the IDD Safety and Security Policy, standards, procedures and supporting tools and guidelines. These will be included in the initial inductions and briefings for all staff and a signed acknowledgement will be kept by the Human Resources (HR) department(s).

Health and Safety

IDD obligations

IDD will maintain safe and healthy working conditions, provide and maintain relevant equipment and machinery, ensure safe storage/use of substances and provide Personal Protective Equipment (PPE) when necessary. IDD will also arrange relevant health and safety regulations including fire prevention. Dissemination of and adherence to these regulations and procedures to all concerned staff members has to be ensured.

Employee's health and responsibilities

Wherever required and feasible, IDD will assess the fitness of employees for work before employment through pre-employment health screening. While IDD will do its utmost to uphold a secure and safe working environment, all staff remains ultimately responsible for his/her own health.

Country specific Medical plans

Customized country-based Medical plans shall be in place. These must include guidance for accessibility of quality health care, medication and treatment; ambulance services and domestic and international medical evacuation; and response plan to sexual assault incidents.

Other country specific guidance and provisions

Apart from the procedures outlined in the Medical plans, other emergency procedures have to be in place and duly implemented, particularly those related to the safety of travel, fire evacuation, recurrent or probable natural disasters and other significant incident(s).

First aid

First aid kits have to be accessible in all IDD offices and IDD operated vehicles. IDD management must ensure that every IDD staff member receives 1st aid training and is regularly retrained at least biennially (every two years).

Operational procedures

Country/regional threat analysis

IDD will assess the level of threats to IDD staff and assets in countries or regions of operations through a three-level ranking:

- **Red** (volatile, high risk environment, targeted attacks against aid workers)
- **Orange** (occasional insecurity)
- **Green** (reasonably safe)

Requirements for security standards and protocols in individual countries/ regions will be organized accordingly.

Risk assessment and SMP comes first

An SMP must be developed for all countries where IDD operates, even those currently thought to be „secure“. In countries or regions classified as Red or Orange, IDD will not conduct any operations without an adequate initial risk assessment and SMP.

Role of field offices

Field Offices will ensure that the design, planning, operations and implementation of IDD programmes incorporate acceptance as our core approach. All major stakeholders who can potentially affect and influence IDD programmes and its delivery will be consulted regularly and an appropriate relationship will be maintained.

Incident management

In cases of significant security incidents, RDD management will proceed according the IDD Policy on Crisis Management. This presumes an activation of the Crisis Management Team (CMT) at IDD HQ and the establishment of an Incident Management Team (IMT) in the country of incident. IMT reports to and consults with CMT in all key and critical decisions.

Learning from incidents is crucial. CMT/IMT is responsible for the provision of comprehensive incident reports, with recommendations to RDD management to minimise the chances of repetition.

No use of firearms

The use of firearms and other weapons at IDD facilities, vehicles (including rental) and by IDD staff is not permitted unless it is a last resort. Any exemption to this standard must have the written approval of the RDD management.

IDD staff must not carry or use firearms/weapons at any time.

The presence of firearms, weapons of any type or armed personnel in any IDD facility or vehicle is prohibited unless there is an immediate threat to life, or the proper approval procedures have been followed to allow protection of IDD staff and property.

IDD will use armed escorts and guards only as a last resort, or when required by local authorities and in support of life-saving activities.

Kidnapping

In the event of an abduction of a IDD staff member:

- IDD will use all appropriate means to secure the release of staff members that have been abducted. IDD cannot give in to the demands and will observe its no-ransom policy.
- IDD will maintain confidentiality about the negotiation process and will request the same from government authorities, hostage negotiators and/or family members.
- IDD will keep family members apprised of the situation and offer support to families throughout and after the ordeal.
- IDD will ensure that post-abduction procedures include an organizational debriefing, access to professional counselling and other assistance deemed necessary to support the recovery of the affected staff member.
- Utilization of media and social networks
- Unwise and uncontrolled interaction with the media and the use of social networks can jeopardize the security of IDD staff, partners, beneficiaries and/or programmes. Interaction with the media can be handled only by designated persons, while social networks should be used in a restrained manner, respecting the IDD Media Policy. In case of security incidents involving IDD staff, it is strictly forbidden to share any confidential information through social media or other channels.

Final waiver

While IDD is committed to the safety and security of its staff, it has to be recognized that there are many variables beyond the control of IDD that can impact the welfare of its staff, and it is not possible to eliminate all the risks associated with the work that we do in the places where we work.