



Head Office Jondoru Residential Area-Opp SSBL

Contact: +211 924 527 758/ (0) 916 735 475

Email: [info@pilgrimsofhope.org](mailto:info@pilgrimsofhope.org)

: [pilgrimshope18@gmail.com](mailto:pilgrimshope18@gmail.com)

Web: [hopepilgrims.org](http://hopepilgrims.org)

---

## Programs Participant Protection Policy and Pilgrims of Hope Code of Conduct

*August 2018*

*Pilgrims of Hope – Programs Participant Protection Policy:*

## Contents

<b>Pilgrims of Hope Programs Participant Protection Policy</b>	<b>1</b>
1) Introduction	1
2) Pilgrims of Hope’s policy	1
3) Scope of policy	1
4) Abuse of power and sexual exploitation	2
5) Partner organizations	2
6) Preventive measures to reduce the potential for abuse	3
7) Relationships with beneficiaries	4
8) The Pilgrims of Hope Code of Conduct	4
9) Duty to report	5
10) Review of policy and Code	5
<b>Pilgrims of Hope Code of Conduct</b>	<b>6</b>
<b>Annex 1 Terminology</b>	<b>10</b>

Throughout this document, the term **inappropriate behavior** (which may range from mild to grossly inappropriate behavior) is intended to include, but is not limited to:

- ❖ Bullying
- ❖ Verbal, physical or sexual harassment
- ❖ Rape and attempted rape
- ❖ Exploitation (including sexual exploitation)
- ❖ Abuse (including sexual abuse)
- ❖ Any actions that harm children or place them at risk of harm
- ❖ Intimidation
- ❖ any form of discrimination
- ❖ entering into relationships which cause, or could potentially cause, conflicts of interest at work
- ❖ Behavior that brings, or could potentially bring, the organization into disrepute
- ❖ showing a lack of respect for the dignity of others
- ❖ behaving in a culturally insensitive manner
- ❖ behaving in a manner which leads to, or could potentially lead to, health or security problems for the individual Pilgrims of Hope and/or for other people
- ❖ Theft
- ❖ Unauthorized use or possession of Pilgrims of Hope property – or of the property of a third party while acting or claiming to act on behalf of Pilgrims of Hope and serious negligence or deliberate misuse of Pilgrims of Hope property
- ❖ Any attempt to commit fraud or to accept or solicit a bribe
- ❖ Any finding of inappropriate behavior, including those actions outlined above, by anyone working for or on behalf of Pilgrims of Hope will lead to disciplinary action up to and including dismissal.

## PILGRIMS OF HOPE PROGRAMS PARTICIPANT PROTECTION POLICY

### **1. Introduction**

Pilgrims of Hope is aware that the goods and services provided through our relief and development programs can create a power differential between those who are employed or engaged by Pilgrims of Hope and other programs participants. We acknowledge that there is potential for this power imbalance to be exploited by Pilgrims of Hope staff to acquire bribes, payments, gifts, and/or sexual favors. This policy has been developed to ensure the maximum protection of programs participants, especially beneficiaries, from abuse and exploitation, and to clarify the responsibilities of Pilgrims of Hope staff, partner organizations and anyone engaged by Pilgrims of Hope or visiting our programs, and the standards of behavior expected of them.

'Programs participant' refers to any individual associated with Pilgrims of Hope's programs and includes:

- ❖ Beneficiaries of programs delivered by Pilgrims of Hope or its partners
- ❖ People employed or engaged by Pilgrims of Hope, whether national or international, full or part time, consultants, interns, contractors or volunteers, or any person actively involved in the Pilgrims of Hope programs
- ❖ Pilgrims of Hope's partner organizations, their staff and anyone working on their behalf

Abuse of power has, in the past, led to many forms of exploitation within the relief and development sphere. Pilgrims of Hope condemns any abusive or exploitative behavior and is committed to the protection of its programs participants, particularly the beneficiaries, as they are the most vulnerable.

Anyone contracted to work with Pilgrims of Hope or working on behalf of Pilgrims of Hope must formally agree to adhere to this policy.

### **2. Pilgrims of Hope's policy**

It is Pilgrims of Hope's policy to take all reasonable steps to protect beneficiaries - children, women and men - from harassment and abuse perpetrated by:

- Staff of Pilgrims of Hope
- Staff of Pilgrims of Hope's partner organizations and anyone working on their behalf
- -People engaged by Pilgrims of Hope such as consultants, contractors, volunteers, interns, or any person actively involved in the Pilgrims of Hope programs
- Visitors to Pilgrims of Hope's programs and accompanying dependants of international staff<sup>1</sup>.

This policy concentrates on prevention of abuse of all programs participants regardless of sex or age. All programs participants have the same right to freedom from abuse and exploitation. Such rights are outlined in, among other documents, the Universal Declaration of Human Rights<sup>2</sup> (UDHR), the UN Convention on the Rights of the Child (CRC)<sup>3</sup>, the UN Convention for the Elimination of all Forms of Discrimination against Women (CEDAW)<sup>4</sup>, and in the national laws of most of the countries in which we work.

We acknowledge that certain groups, such as children (individuals under 18 years of age) and women are considered most at risk from abuse, harassment, physical and sexual violence. The HIV and AIDS pandemic has added to the vulnerability of women and children. We believe that children deserve special protection given their particular vulnerabilities<sup>5</sup>

As we work in situations that present serious and specific risks to children, we will ensure that any of our programs which address the needs of children will be delivered in a manner that considers their safety and protection. We will ensure that programs always take into account the situation of children, the specific protection risks and issues they face (which may be different for boys and girls) and address these as far as possible. We will not tolerate anybody employed by or associated with Pilgrims of Hope harming children.

<sup>1</sup> In the event of an allegation of a breach of this policy by an accompanying dependant of an international staff member, the allegation will be investigated and the country programs management team, in consultation with the Regional Director and the HR Director, may take action up to and including the removal of accompanied status in relation to that individual, and the referral of the matter to the national authorities. Those employed or engaged by international staff to work in a Pilgrims of Hope house (cook, housekeeper, gardener, etc.) or to work for the international staff member or his/her accompanying dependants (translator, driver, teacher, etc.) are also protected by this policy, despite the fact that they are not Pilgrims of Hope staff. Pilgrims of Hope staffs are responsible to inform the staff they employ about the content of this Policy.

### 3. *Scope of Policy*

For contracts with employees, partners, consultants and contractors specific wording has been developed for inclusion in each of these types of contract and is set out in the Programs Participant Protection Policy (P4) Guidelines Document. This wording confirms that the relevant individual/party has read, understood and agrees to be abide by and promote the terms of this policy. Any finding of inappropriate behavior including those actions outlined in the Pilgrims of Hope Code of Conduct, by a Pilgrims of Hope staff member or anyone working on behalf of Pilgrims of Hope, will lead to disciplinary action up to and including dismissal

Acceptance of this policy is a pre-condition of any partnership agreement and this should be clearly stated in all partnership agreements. A partner organization's failure to adhere to this policy may result in actions up to and including withdrawal of funding and support.

For agreements with contractors, it should be included as a pre-condition of any contract if the contractor will be in direct contact with Pilgrims of Hope's beneficiaries as a result of the contract entered into between Pilgrims of Hope and the contractor.

Pilgrims of Hope will make every effort to ensure that all employees, partners, consultants and relevant contractors comply with this policy. The action that will be taken by Pilgrims of Hope in the event of a breach of this policy by an employee, partner, consultant or relevant contractors is further outlined in section 6. Pilgrims of Hope cannot however, be held responsible for the actions of these third parties if they breach this policy, and this is reflected in the wording to be included in their contracts.

### 4. *Abuse of power and sexual exploitation*

Pilgrims of Hope considers all forms of abuse of power and exploitation to be incompatible with its fundamental belief in the human dignity of all people, international legal norms and standards, and with its core values. Pilgrims of Hope staff and people engaged by Pilgrims of Hope must never engage in any forms of humiliating, degrading, abusive or exploitative behavior under any circumstances. Pilgrims of Hope prohibits the exchange of money, employment, goods or services for sex (including sexual favors or other forms of exploitative behavior). This includes exchange of assistance that is due to beneficiaries.

Pilgrims of Hope believes that engaging in commercial sexual transactions<sup>6</sup> is contrary to its core values and undermines the work and the reputation of the organization. In most cases, a transaction of this sort is the result of an unequal power dynamic and, as such, exploitative. Such behavior brings the organization into disrepute, and disciplinary action - up to and including dismissal - will be taken against any staff member engaging in such transactions.

All staff and people engaged by Pilgrims of Hope, its partner organizations and visitors to Pilgrims of Hope programs are required to respect the rights and dignity of the children, families and communities with whom we work and/or with whom they have contact, and always act in their best interest.

Any type of sexual activity or any inappropriate behavior which could be deemed to be sexually offensive, provocative or abusive between a Pilgrims of Hope staff member and a child (a person under the age of 18) is prohibited regardless of local custom, or the age of majority or consent locally. Mistaken belief in the age of a child is no defense.

In order to be fully aware of the issues faced by Pilgrims of Hope in relation to the protection of programs participants, it is essential for all staff to be aware of local cultural and religious practices. Pilgrims of Hope believes that staff should carry out their work in a manner that recognizes and respects local customs and culture. However, 'culture' can never be used as an excuse or a motive for inappropriate behavior. Pilgrims of Hope will not accept using respect for local culture as a justification for ignoring or supporting harmful practices.

### 5. *Partner organizations*

Pilgrims of Hope increasingly works through international and national partner NGOs, civil society organizations, and community-based groups, with the result that there is less direct contact between our staff and the beneficiaries of our interventions. Acceptance of and compliance with the Pilgrims of Hope Programs Participant Protection Policy must be a condition of every partnership agreement or Memorandum of Understanding<sup>7</sup>. In signing a Memorandum of Understanding, partner organizations commit to ensuring that their personnel will also adhere to this Policy.

This policy must be used as a tool to bring up the issue of the conduct of staff and others working with or on behalf of the partner organization during negotiations with these organizations.

<sup>5</sup> Children have strengths, capabilities and resilience that mean they should not simply be seen as likely victims, but in general their age, developmental stage, dependency, status and lack of power and position in communities mean they are more susceptible to violence, abuse and exploitation. Some groups of children, e.g. disabled children, may be even more vulnerable.

<sup>6</sup> For the purpose of this Code, a 'transaction' is defined as any exchange of money, goods, services or favors with any person.

Directors of partner organizations must ensure that:

- the content of the policy is disseminated amongst their staff and those working on behalf of the organization such as consultants, volunteers, partner organizations, etc.
- Programs beneficiaries are made aware of the standards of behavior expected of organization staff and those working on behalf of the organization
- a complaint and response mechanism for beneficiaries is established (with the support of Pilgrims of Hope if required)
- they will take appropriate actions when the standards of this policy are not adhered to
- They will establish an action plan for the implementation of the policy including necessary staff training and will report on the implementation on a regular basis (with the support of Pilgrims of Hope if required).

This Policy seeks to complement and reinforce any existing policies, codes or other instruments already developed by partner organizations. It is not intended to replace or in any way to detract from these. In the event that partner organizations do not comply with this Policy, Pilgrims of Hope reserves the right to withdraw funding and/or terminate any partnership agreements entered into.

#### **6. Preventive measures to reduce the potential for abuse**

Pilgrims of Hope staff must be aware of the power dynamics that may exist within the communities where we are operational, and those between Pilgrims of Hope staff and other programs participants, in particular beneficiaries.

Abuse of power is often at the base of incidents of harassment, exploitation and inappropriate behavior. The following are considered as measures to reduce the potential for abuse of power and it is the responsibility of Country Directors to ensure that these measures are taken and that they address the situation of all programs participants including children:

- As far as possible, ensuring field-work teams are gender-balanced at all levels of responsibility, in both main and sub-offices.
- Ensuring that no individual staff member can create a situation where he or she alone is perceived to be the sole and final authority responsible for allocating benefits.
- Appointing a committee in each country programs to train all staff members and raise awareness of the content of the policy, and the Pilgrims of Hope Code of Conduct among all programs participants.
- Making all beneficiaries aware:
  - ✓ That they are entitled to assistance: beneficiary selection criteria, quantity and variety of items they should receive, how the distribution is taking place (day, time, location, method), etc.
  - ✓ that Pilgrims of Hope 's and partner organizations' staff have a duty to deliver assistance without discrimination
  - ✓ that goods and services delivered cannot be withheld or withdrawn on the arbitrary decision of the staff members or those working on behalf of Pilgrims of Hope or its partner organizations
  - ✓ that it is unacceptable for the staff or those working on behalf of Pilgrims of Hope or its partner organizations to solicit or accept bribes, rewards, gifts, or sexual favors from a beneficiary of the standards of behavior expected of staff members and those working on behalf of Pilgrims of Hope and its partners Particular consideration needs to be given to ensure the accessibility of this information. This may require translation into different languages, the use of picture based information, or ensuring that children can understand the language being used.
  - ✓ Developing complaints and response mechanisms and clarifying them to all programs participants
  - ✓ Electing focal points who can receive complaints and Pilgrims of Hope s in relation to the policy and the Pilgrims of Hope Code of Conduct. The focal points' responsibilities include forwarding the complaints to the Human Resources department or the appropriate senior manager<sup>8</sup>.
  - ✓ Training senior staff members in each field on how to investigate complaints.

*It is the responsibility of all senior management at field and head office levels to ensure that all Pilgrims of Hope staff, personnel from partner agencies, consultants, contractors, beneficiaries and visitors to Pilgrims of Hope programs are acquainted with the requirements of this policy.*

If acts have been committed in relation to our programs participants which are criminal, infringe individual's rights, or contravene the principles contained in this document, ***the organization will take immediate action***

*appropriate to the circumstances and will address the support needs of those involved in the case.*

<sup>7</sup> Pilgrims of Hope’s definition of partners includes local governments. While we cannot compel them to sign this policy, we should make sure that governments officials we engage with are aware of it and understand its content.

***This may mean for:***

Staff or those working on behalf of Pilgrims of Hope	disciplinary action up to and including dismissal
Volunteers	action up to and including termination of appointment
Partner organization personnel, or those working on behalf of the organization	action up to and including the withdrawal of funding or support and/or termination of partnership agreements
Contractors/Consultants	termination of contract
Visitors to Pilgrims of Hope	appropriate action up to and including suspension of support for the visit

Any action taken will be in accordance with Pilgrims of Hope’s policies and procedures and informed by national laws. Depending on the nature and circumstances of the case, Pilgrims of Hope will involve the appropriate authorities to ensure the protection of programs participants.

It should be made clear to all existing and potential partners that Pilgrims of Hope may be unable to continue the partnership if – after proper investigation - we develop serious doubts about:

- the ability of the partner to uphold this policy
- The behavior of any individual working on behalf of the partner organization or associated with it - if this behavior contravenes this policy and if appropriate action is not taken by the partner organization to address it.

### ***7. Relationships with beneficiaries***

Those working on behalf of Pilgrims of Hope and its partner organizations have potentially greater access to goods, services and power than members of the communities in which we operate. This greater access could be used to pressure or exploit beneficiaries or other programs participants.

Power imbalances increase the opportunities for beneficiaries to be placed in exploitative positions. For this reason Pilgrims of Hope believes that sexual relationships between Pilgrims of Hope staff and beneficiaries are inappropriate as they may undermine the credibility and integrity of our work. However, we recognize that Pilgrims of Hope staffs are often members of the communities in which we operate, and therefore may develop relationships in those communities. In order to ensure that beneficiaries are protected, and to protect Pilgrims of Hope staff and the organization from allegations of biased and more favorable treatment being given to some members of the community, Pilgrims of Hope staff must make any such relationship known immediately to the senior manager in the programs area to clarify what could otherwise become an ambiguous situation.

<sup>8</sup> The role and responsibilities of the focal points for receiving complaints will be explained in detail in the Complaints and Response Mechanism Guidelines

### ***8. The Pilgrims of Hope Code of Conduct***

A Code of Conduct is considered a key tool for the prevention of harassment, exploitation, abuse and inappropriate behavior by staff. The Pilgrims of Hope Code of Conduct describes the standards of behavior expected of all staff and anybody engaged by Pilgrims of Hope, and seeks to promote good practice.

*All Pilgrims of Hope staff, the representatives of partner organizations, visitors<sup>9</sup> and all people associated with Pilgrims of Hope programs must be given a copy of this policy and the Pilgrims of Hope Code of Conduct in a language that they can understand, and an explanation of the content of both documents. They must confirm that they have read them, understood their content, and that they agree to conduct themselves in accordance with them.<sup>10</sup>*

It is the responsibility of all Pilgrims of Hope staff to adhere to both the Programs Participant Protection Policy and the Pilgrims of Hope Code of Conduct.

### ***9. Duty to report***

Any known or suspected case of abuse, exploitation, or harassment of programs participants must always be brought to the attention of the line manager, or a senior manager, or the Human Resources department or the focal points elected in the countries to receive complaints. In the event that staff members have Pilgrims of Hope s related to the behavior of the Country Director, they may raise these Pilgrims of Hope s directly with the Human Resources Directorate in Dublin or with their Regional Director.

The reporting of a Pilgrims of Hope may result in a confidential, thorough and prompt investigation being conducted. Such investigations may reduce the level of Pilgrims of Hope or lead to the realization that further action is appropriate. People reporting possible violations and/or involved in such investigations – including the subject of

the complaint - will be protected against any form of intimidation, threats, reprisal or retaliation resulting from the alleged incident. If any member of staff is found intimidating or retaliating against a person making a complaint or assisting in an investigation, disciplinary action - up to and including dismissal - will be imposed. All information related to the case will be held in the strictest confidence. It will be disclosed only on a need-to-know basis in order to resolve the matter.

Any intentionally false, malicious or vexatious statement, misrepresentation or accusation against another staff member or third party will be considered gross misconduct.

About breaches of these standards of behavior by Pilgrims of Hope staff or other programs participants must be handled with the utmost confidentiality, recorded and the record held in a secure location with the Country Director or the Human Resources Directorate.

In the event of an allegation that involves a criminal offence, the member of staff (the subject of complaint) should be informed that, in addition to disciplinary action, the investigation may be reported to the appropriate legal authorities for further investigation.

## **10. Review of policy and Code**

The implementation of this policy will be monitored through a range of instruments such as programs, country and sector evaluations. The Country Director is responsible for ensuring that the policy is translated in the local language, training on the Policy is taking place and that a complaints and response mechanism is appropriately developed, implemented and monitored. Feedback on progress towards the implementation of this policy will be included in the annual priorities and reports of all country programs.

Pilgrims of Hope recognizes that both internal and external environments change. Such change may have a bearing on the scope and content of this policy. Consequently, it will be reviewed periodically. The review process will be consultative and participatory in nature. The responsibility for initiating the policy review process rests with Pilgrims of Hope's Senior Management Team (SMT) and Board of Directors.

Pilgrims of Hope's SMT reserves the right to add, alter, amend, modify or delete any provision in this policy in accordance with Pilgrims of Hope's social and legal obligations to its programs participants.

<sup>9</sup> All visitors to Pilgrims of Hope's programs must - during their visit – consider themselves to be under the authority of the Pilgrims of Hope Executive Director and must adhere to the Pilgrims of Hope Programs Participant Protection Policy (P4). In the event that a visitor refuses to formally agree to regulate his/her conduct in line with the requirements of the Pilgrims of Hope P4, the name of the person and the reason for refusing it should be recorded by the management and the case reported to the Board of Directors who will decide the action to be taken.

<sup>10</sup> It is the responsibility of the Pilgrims of Hope staff member contracting the person or agreeing to/organizing his/her visits to the field to ensure that this is done.

## **PILGRIMS OF HOPE CODE OF CONDUCT**

### **Introduction**

Pilgrims of Hope, as a non-governmental, international humanitarian organization involved in the alleviation of poverty, seeks to implement successful relief and development programs through its commitment to good practice and the quality of work of its staff and those of its partner organizations.

Pilgrims of Hope staffs frequently work in situations where they are in positions of power and trust (in relation to beneficiaries, other organizations and one another). This power and trust must not be abused.

All Pilgrims of Hope staff has a responsibility to the organization to strive for and maintain the highest standards in the day-to-day conduct of their work. Any form of exploitation or abuse of power is incompatible with Pilgrims of Hope's fundamental belief in the human dignity of all people, and with the organization's core values.

The aim of the Pilgrims of Hope Code of Conduct is to provide clear guidance on the standards of behavior the organization requires all staff, anyone working on behalf of Pilgrims of Hope and any partner organization to abide by, as well as providing examples of conduct that will be considered unacceptable. The Code is designed to guide and protect all staff and programs participants.<sup>1</sup> any breach of this Code may result in disciplinary action up to and including dismissal.

Whilst recognizing that laws and cultures differ considerably from one country to another, the Code is based on international legal standards and principles of codes of conduct<sup>2</sup>. In addition, it is written to reflect the organization's core values and commitment to ensuring that staff always acts in the best interest of all programs participants.

This Code applies to all people engaged by Pilgrims of Hope, regardless of location, whether national or international, full or part time, consultants, interns, contractors or volunteers, and should be adhered to at all times.

This Code and the Programs Participant Protection Policy are mutually supporting documents and should be considered in conjunction with each other.

As with the Programs Participant Protection Policy, Pilgrims of Hope’s partner organizations are expected to Comply with the standards of behavior outlined in this Code.

All visitors to Pilgrims of Hope’s programs must - during their visit – consider themselves to be under the authority of Pilgrims of Hope Country Director and must adhere to the Pilgrims of Hope Programs Participant Protection Policy.

<sup>1</sup> ‘Programs participant’ refers to any individual associated with Pilgrims of Hope’s programs and includes: i) beneficiaries of programs delivered by Pilgrims of Hope or its partners; ii) people employed or engaged by Pilgrims of Hope, whether national or international, full or part time, consultants, interns, contractors or volunteers and any person actively involved in the Pilgrims of Hope programs; iii) Pilgrims of Hope’s partner organizations, their staff and anyone working on their behalf.

<sup>2</sup> UN Secretary General’s Bulletin *Special measures for protection from sexual exploitation and sexual abuse* (ST/SGB/2003/13): <http://ochaonline.un.org/OchaLinkClick.aspx?link=ocha&DocId=1001083>; *Statement of commitment on eliminating sexual exploitation and abuse by UN and non-UN personnel* signed by High-level Conference on Eliminating Sexual Exploitation and Abuse by UN and NGO Personnel in December 2006 in New York: <http://ochaonline.un.org/OchaLinkClick.aspx?link=ocha&docId=1061170>; Code of Conduct for Humanitarian Workers in the Kenya Refugee Programs, Nairobi, Kenya 2003; Code of Conduct for Humanitarian Agencies in Sierra Leone, 1998; The Code of Conduct for NGOs in Ethiopia, 1999; Tanzania NGO Code of Ethics, Draft April 2007.

### *Standards of Conduct*

As a staff member of Pilgrims of Hope I....., commit myself to:

1. ***Be responsible for the use of information, assets and resources to which I have access by reason of my employment with Pilgrims of Hope.***
  - a) I will ensure that I use Pilgrims of Hope assets and resources entrusted to me in a responsible manner and account for all money and property, following the appropriate policy and procedural requirements.
  - b) I will not use the organization’s computer equipment or other technology or equipment<sup>3</sup> or services in contravention of Pilgrims of Hope’s IT Regulations to engage in any activity that is illegal under local, state, or international law or that encourages conduct that would constitute a criminal offence. This includes any material that victimizes, harasses, degrades, or intimidates an individual or a group of individuals on the basis of gender, race, religion, sexual orientation, age, disability or ethnicity or other personal characteristic.
  - c) I will not use Pilgrims of Hope’s computer equipment or other technology or equipment<sup>4</sup> to view, download, create, distribute, or save in any format inappropriate material, including but not limited to adult or child pornography.
  - d) I will use all project goods and services, including those provided by/property of a third party<sup>5</sup>, in an appropriate manner.
  - e) I will not release to others any private or confidential information relating to Pilgrims of Hope (or for which Pilgrims of Hope is responsible) unless legally required to do so.
2. ***Be responsible for my own health, safety and welfare, and of those of the staff I manage.***
  - a) I will adhere to all organizational health and safety regulations and procedures in force in my work place.
  - b) I will comply with any local security guidelines and in a manner consistent with Pilgrims of Hope’s Security Policy.
  - c) I will behave in ways that avoid creating unnecessary risk to my safety, health and welfare or others (including partner organizations and beneficiaries).
3. ***Ensure that my personal and professional conduct is, and is seen to be, of the highest standard and in keeping with Pilgrims of Hope’s beliefs, values and mission.***
  - a) I will treat all people with respect and dignity. I will not discriminate, show differential treatment to, or favor particular individuals to the exclusion of others.
  - b) I will, in our programs, promote the well-being and development of children and will not engage in behavior that is likely to cause harm, including physical, sexual, emotional abuse and neglect.
  - c) I will observe all local laws and behave in a culturally sensitive manner.
  - d) I will not work under the influence of alcohol or drugs (with the exception of prescribed drugs for health reasons) or illegal substances that affect my ability to perform my duties.<sup>6</sup>
  - e) I will not use, distribute, sell or be in possession of illegal substances on Pilgrims of Hope premises, whilst on Pilgrims of Hope business or whilst using Pilgrims of Hope vehicles.
  - f) I will ensure that my behavior both during and outside of work does not bring Pilgrims of Hope into disrepute and does not impact on or undermine my ability to undertake the role for which I am employed.

- g) I will not abuse my position as a Pilgrims of Hope staff member for personal gain by requesting, soliciting or accepting any payment, gift, service or favors (including sexual favors') from others, whether for my own personal benefit or for another person, in return for Pilgrims of Hope support, goods or services.
- h) I will not enter into commercial sexual transactions at any time.<sup>7</sup>

**4. *Perform my duties and conduct my private life in a manner that avoids possible conflicts of interest with the work or reputation of Pilgrims of Hope and my work as a staff member of the organization.***

- a) I will avoid situations where my personal interests could conflict, or reasonably appear to conflict, with the interests of Pilgrims of Hope. Therefore, I will not enter into any sort of business relationship on behalf of Pilgrims of Hope with family members, friends or other personal/professional contacts for the supply of any goods or services to Pilgrims of Hope or any employment related matters without authorization from senior management. I will declare any potential conflict of interest to my line manager.
- b) I will not be involved in awarding benefits, contracts for goods/services, employment or promotion within the organization, to any person with whom I have financial, personal, family (or close intimate relationship) interests.<sup>8</sup>
- c) I will not accept bribes or gifts (except small tokens of appreciation) or any remuneration from governments, beneficiaries, partners, suppliers or other persons which have been offered to me as a result of my employment with Pilgrims of Hope. I will notify my line manager if I am offered or have received gifts of any kind, however small.<sup>9</sup>
- d) I am aware that sexual relationships between a Pilgrims of Hope staff member and a beneficiary are likely to be based on inherently unequal power dynamics and may undermine the credibility of the organization and its work. I know that Pilgrims of Hope considers such sexual relationships inappropriate. Should I be in or develop a sexual relationship with a beneficiary, I will inform immediately a senior manager in my programs area of the relationship in order to clarify what could otherwise become an ambiguous situation.
- e) I will not undertake work or duties outside Pilgrims of Hope that negatively influence my ability to perform my function or have a negative impact on the work of Pilgrims of Hope.

**5. *Avoid involvement in any activities that are illegal, or contravene human rights<sup>10</sup>, or compromise the work of Pilgrims of Hope.***

- a) I will not take part in or support any illegal activities.
- b) I will not engage in any type of sexual relations or any sexual activity with a child. A 'child' is taken to be anyone under the age of 18 regardless of local custom, or the age of majority or consent locally.
- c) I will not abuse or exploit children or adults in any way and will report any such behavior by others to a senior manager in my programs area.<sup>11</sup>
- d) I will refrain from inappropriate behavior or action that might jeopardize Pilgrims of Hope's reputation.

**6. *Refrain from any form of bullying, harassment, discrimination, abuse, intimidation or exploitation.***

- a) I will act fairly and honestly, and treat others with dignity and respect, regardless of issues such as gender, race, religion or lack of religion, color, national or ethnic origin, language, marital status, family status, birth, sexual orientation, age, disability, socio-economic background, caste, political conviction, HIV and AIDS status, physical appearance or lifestyle.
- b) I will never engage in any humiliating, degrading or exploitative behavior.
- c) I will not use or condone language that is inappropriate, demeaning, or offensive towards others.

<sup>7</sup> For the purpose of this Code, a 'transaction' is defined as any exchange of money, goods, services or favors with any person.

<sup>8</sup> All Pilgrims of Hope staff must avoid direct responsibility for the hiring or supervision of a family member. Employment of family members is permitted as long as staff members are not reporting directly to each other.

<sup>9</sup> In general gifts should not be of such value as to constitute a personal enrichment for the recipient and should not be such as to appear excessive to an objective observer. The head of program's Senior Management Team or Executive Director will review the list of gifts being received and indicate whether this is appropriate or not.

<sup>10</sup> In addition to the Universal Declaration of Human Rights, recognition should be given to the rights of women and children, as outlined in the UN Convention for the Elimination of all Forms of Discrimination against Women (CEDAW) and the UN Convention on the Rights of the Child (CRC), with particular emphasis on the guiding principle of 'the best interest of the child' (Article 3): <http://www2.ohchr.org/english/law/crc.htm>.

**7. Report any incident, Pilgrims of Hope or suspicion regarding any breaches of this Code of Conduct.**

- a) I will bring to the attention of the relevant manager or the Human Resources manager within Pilgrims of Hope any potential incident, abuse or Pilgrims of Hope that I witness, I am made aware of, or suspect which appears to break the standards contained in this Code.
- b) I will not intentionally make malicious or false accusations in relation to this Code against any programs participant.
- c) I will ensure that all information about breaches of this Code is handled with the utmost discretion.

I have read carefully and understand the Pilgrims of Hope Code of Conduct and the Programs Participant Protection Policy and hereby agree to abide by its requirements and commit to upholding the standards of conduct required to support Pilgrims of Hope’s core values and mission.

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

Name .....

Date.....

Signature.....

Organization/ Station Manager.....

<sup>11</sup> Those employed by international staff to work in a Pilgrims of Hope house (cook, housekeeper, gardener, etc.) or to work for the international staff member or his/her accompanying dependants (translator, driver, teacher, etc.) are also protected by this policy, despite the fact that they are not Pilgrims of Hope staff.

## **Annex 1 Terminology**

Clear definitions are essential to ensure that the proper reporting of, and responses to, instances of abuse or Exploitation is handled in a consistent manner. Clarifying the definitions of inappropriate behavior with staff and other programs participants should be included in workshops and inductions around this policy and the Code of Conduct.

The following provides Pilgrims of Hope’s definitions of the terminology used in this Policy and Code. However, staff is also bound by the local laws of the countries in which they work.

### **Abuse**

Abuse is the 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, 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 behavior, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could reasonably be regarded as undermining the individual’s right to dignity at work.

An isolated incident of the behavior described in this definition may be an affront to dignity at work, but, as a once-off incident, it is not considered to be bullying. The exercise of legitimate management rights or of legitimate employee rights or responsibilities is not bullying. Interpersonal differences and conflicts may arise in the workplace for a variety of reasons including the implementation of legitimate management directives.

*A pattern of the following behaviors are examples of types of bullying:*

- ✓ Verbal abuse or insults;
- ✓ being treated less favorably than colleagues;
- ✓ Intrusion – pestering, spying or stalking;
- ✓ Menacing behavior;
- ✓ Intimidation;
- ✓ Excessive monitoring of work;

- ✓ Humiliation;
- ✓ withholding work related information;
- ✓ Repeatedly manipulating a person's job content and targets;
- ✓ Blame for things beyond the person's control;
- ✓ manipulation of the victim's reputation by rumor, 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 victimization;
- ✓ aggressive behavior 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 potential solutions;
- ✓ Criticizing an individual in front of others.

### **Child**

Like many other humanitarian organizations, Pilgrims of Hope defines a child as anyone under the age of 18 years in accordance with the UN Convention on the Rights of the Child<sup>12</sup>, irrespective of national law or custom regarding the age of consent or majority.

### **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, where there is definite knowledge, or reasonable suspicion, that the injury was inflicted or knowingly not prevented. (CAFOD)

**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 behavior and emotional development of a child or young person. (CAFOD)

**Neglect** occurs when basic needs such as food, warmth and medical care are not met, or when there is a failure to protect a child from exposure to any kind of danger, resulting in serious impairment of a child's or young person's health or development. (CAFOD)

**Sexual abuse** occurs if a child or young person is pressurized or forced to take part in any kind of sexual activity, whether or not the child is aware of or consents to what is happening. Sexual abuse includes incest, rape and fondling. It may also include no contact activities such as showing child pornography or internet based activity and viewing pornographic images of children. Sexual abuse may involve siblings or other family members, or persons outside the family. (CAFOD)

**Commercial or other exploitation of a child** refers to use of the child in work or other activities for the benefit of others. This includes, but is not limited to, child labor and child prostitution. These activities are to the detriment of the child's physical or mental health, education, moral or social-emotional development (WHO, 1999).

### **Discrimination**

Unequal treatment of individuals or groups on the basis of personal characteristics such as disability or appearance or group characteristics such as ethnicity, religious orientation, etc. Common forms of discrimination may include, but are not limited to, making employment or programming decisions based on family status, race, membership of a minority group, gender, religion or lack of religion, color, national or ethnic origin, 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:

- Programs not based on proper needs assessment or situational analysis resulting in interventions that benefit men more than women or vice versa;
- Hiring preferences for one religion or ethnic groups 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

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 well-being. 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.

<sup>12</sup> The Convention emphasizes that States substituting an earlier age for specific purposes must do so in the context of the Convention's guiding principles of non-discrimination (Article 2), the best interests of the child (Article 3), maximum survival and development (Article 6) and participation of children (Article 12): <http://www2.ohchr.org/english/law/crc.htm>.

*Examples of exploitation include, but are not limited to:*

- Offering special benefits to beneficiaries or other programs participants in exchange for expressed, implied or demanded favors (including sexual favors) 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 labor.
- Selling, buying, transporting children, women or men by means of coercion or deception for economic or other gain.<sup>13</sup>

## Fraud<sup>14</sup>

The theft or misuse of Pilgrims of Hope'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.

Examples of fraud include, but are not limited to, the following:

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

## Harassment<sup>15</sup>

Harassment is unwanted behavior relating to personal characteristics such as race, membership of a minority group, sex, gender, religion or lack of religion, color, 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 written words, pictures or other material.

*Harassment also means less favorable 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.
- ✓ Harassment can take many forms and may involve written documents, the use of IT including email, text messaging, photographs or pictures.

*Many forms of behavior may constitute harassment, including:*

- ✓ verbal harassment - jokes, comments, ridicule or songs;
- ✓ written harassment - including faxes, text messages, emails or notices;
- ✓ physical harassment – jostling, shoving or any form of assault;
- ✓ intimidators 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.

<sup>13</sup> Elements of the current international law on trafficking in human beings is contained in the 2000 UN Convention against Transnational

<sup>14</sup> Definition taken from worldwide Anti-fraud Policy.

<sup>15</sup> Adapted from the Irish Employment Equality Acts 1998 to 2008.

### **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 with the intention of forcing him/her to do, or deterring him/her from doing, something by threats or inducing fear of the consequences against him/her or their family or friends. The person who is intimidated feels coerced or inhibited by the threats. Acts of intimidation can be verbal, non-verbal or physical.

### **Programs Participant**

For the purpose of this policy, 'programs participant' refers to any individual associated with Pilgrims of Hope's programs and includes:

- a) beneficiaries of programs delivered by Pilgrims of Hope or its partners
- b) people employed or engaged by Pilgrims of Hope, whether national or international, full or part time, consultants, interns, contractors or volunteers, or any person actively involved in the Pilgrims of Hope programs
- c) Pilgrims of Hope's partner organizations and their staff or anyone working on their behalf

Community members in general (i.e. those who are not direct or indirect beneficiaries of the programs) are not considered programs participants. However, abusive and/or inappropriate behavior by Pilgrims of Hope staff member towards members of the community where Pilgrims of Hope or its partner are operational will result in disciplinary action being taken.

### **Rape and attempted rape <sup>16</sup>**

Rape is an act of non-consensual sexual intercourse. Any non-consensual penetration is considered rape when it includes the following two elements:

- a) The perpetrator invaded the body of a person by conduct resulting in penetration, however slight, of any part of the body of the victim or of the perpetrator with a sexual organ, or of the anal or genital opening of the victim with any object or any other part of the body.
- b) The invasion was committed by force, or by threat of force or coercion, such as that caused by fear of violence, duress, detention, psychological oppression or abuse of power, against such person or another person, or by taking advantage of a coercive environment, or the invasion was committed against a person incapable of giving genuine consent.

*A person may be incapable of giving genuine consent if affected by natural, induced or age-related incapacity. Genuine consent does not include consent obtained through deception or coercion or where exploitation is a factor in the granting of consent.*

### **Sexual abuse**

The actual or threatened 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**

Any actual or attempted abuse of a position of vulnerability, differential power, or trust, to pressure or demand others to provide sexual favors, 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 behavior can constitute sexual harassment, including:

- a) Physical conduct of a sexual nature. This may include unwanted contact such as unnecessary touching, patting or pinching or brushing against another employee's body, assault and coercive sexual intercourse;

- b) 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;
- c) Non-verbal conduct of a sexual nature. This may include the display of pornographic or sexually suggestive pictures, objects, written materials, emails, text messages or faxes. It may also include leering, whistling or making sexually suggestive gestures;
- d) Sex-based conduct. This may include conduct that denigrates or ridicules or is intimidator or physically abusive of an employee because of his or her sex, such as derogatory or degrading abuse or insults that are gender-related.

### **Violence**

Violence defines aggressive behavior that may be physically, sexually or emotionally abusive. The aggressive behavior is conducted by an individual or group against another, or others.

### **Visitor**

Any person not contracted to work for Pilgrims of Hope , but who is visiting Pilgrims of Hope 's programs, whether as an individual or as a representative of an institution. This includes, but is not exclusive to, consultants, journalists, donors, photographers, members of Pilgrims of Hope Board of Directors, friends, accompanying dependants of international staff, etc.<sup>17</sup> Any such person should - during the visit – consider him/herself under the authority of Pilgrims of Hope Executive Director and must adhere to the Pilgrims of Hope P4. The definition shall not include individuals who call to Pilgrims of Hope's offices for short meeting.

<sup>17</sup> In the event of an allegation of a breach of this Policy by an accompanying dependant of an international staff member, the allegation will be investigated and the country programs management team, in consultation with the Regional Director and the HR Director, may take action up to and including the removal of accompanied status in relation to that individual, and the referral of the matter to the national authorities. Those employed by international staff to work in a Pilgrims of Hope house (cook, housekeeper, gardener, etc.) or to work for the international staff member or his/her accompanying dependants (translator, driver, teacher, etc.) are also protected by this policy, despite the fact that they are not Pilgrims of Hope staff.

**Board of Directors**  
**POH**

Thanks

