



# SAFEGUARDING POLICY AT PAH

---

PREPARED BY: Monika Korowajczyk-Sujkowska

APPROVED ON: March 12<sup>th</sup>, 2020

# SAFEGUARDING POLICY AT PAH

## CODE OF CONDUCT

Policy for preventing corruption and fraud

Policy concerning Protection against Sexual Exploitation, Abuse and Sexual Harassment

PAH's Security System

Child Protection Approach

Policy regarding the system of combating money laundering and terrorist financing

Conflicts of Interest

Employee Training

### INTERNAL CONTROL MECHANISMS

Beneficiary Complaints Mechanism

Global Complaints Mechanism (HQ)

### GRIEVANCE SYSTEM AT PAH

Staff Grievance Mechanism

REVIEWING COMPLAINTS/  
GRIEVANCES / INTERNAL INVESTIGATION

DISCIPLINARY ACTIONS

# INTRODUCTION

Being a humanitarian organisation that follows utmost labour standards and being guided by our duty of care to our beneficiaries and staff members, the Polish Humanitarian Action (PAH) gives priority to creating a work environment that is free from any abuse, violence, discrimination or negligence on the part of the staff members, volunteers and partners of PAH.

**Safeguarding** means protection (in a broad sense of the term) afforded to the beneficiaries, staff members/ volunteers and the organisation, including the protection of their health, mental well-being, human and employee rights, which helps create a work and living environment that is free from any abuse and negligence. By creating adequate mechanisms, PAH wishes to safeguard, primarily our Beneficiaries and PAH employees, from any abuse and violence but it also wishes to protect the good reputation of our organisation.

Therefore, the zero-tolerance approach to any abuse and violence, which has been agreed with the Management Board, applies to all of us – starting from the Management Board and the staff members, to the Beneficiaries and all individuals who cooperate with PAH in any way.

It is our objective not only to implement adequate internal regulations but also to ensure high awareness of the required standards among our staff members, Beneficiaries and Partners by using a planned internal training system and the Grievance System, and by reporting all irregularities.

We also declare no tolerance to failure to respect PAH standards in that we have a transparent process of investigating into incidents, take actions against those at fault, including disciplinary actions, do not cooperate with partners we have concerns about, or terminate cooperation agreements with such partners with immediate effect in certain cases.

Together with the managers, the PAH Management Board resolved that certain key contents and – by extension – policies needed to be addressed more in depth to ensure protection for Beneficiaries and employees. These are:

1. Policy for preventing corruption and fraud
2. Policy for preventing corruption and fraud
3. Policy concerning Protection against Sexual Exploitation, Abuse and Sexual Harassment
4. Policy regarding the system of combating money laundering and terrorist financing
5. Child Protection Approach
6. PAH's Security System
7. Conflicts of Interest
8. Complaints System at PAH
9. Internal Investigations
10. Employee Training and Disciplinary Actions

I.

# CODE OF CONDUCT (COC)

---



# I.

## CODE OF CONDUCT (COC)

In 2019, the Management Board of PAH adopted a new updated Code of Conduct (CoC). The CoC has priority over all other documents. It sets out desirable and unacceptable employee behaviours. There are sanctions in the event of the Code breach. The Code is the key document at PAH. It aims at ensuring high quality of our work and of the aid we provide to our beneficiaries. The Code is available in the Internal Regulation Map at PAH ([link here](#)). A far-reaching information campaign combined with a series of training courses for all staff members was planned as part of its implementation. Existing employees receive periodic refresher courses to refresh that knowledge. New hires are presented with the information during the onboarding session which is a period of training before they take up their duties.

Each employee signs a statement wherein they confirm that they have read and understood the Code of Ethic Conduct of the Polish Humanitarian Action along with appendices, and that they have accepted the values and behaviours described therein. Furthermore, they undertake to adhere to the Code in their daily work with the Beneficiaries, co-workers, partners and external institutions, and they shall report any abuse without undue delay using any channel available.

The main values set out in the PAH Code of Ethic Conduct are as follows:

1. As the personnel of a humanitarian organization, we assume the obligation to bring humanitarian and development aid to persons in need wherever this is necessary, consistently with the decision of the Management Board of Polish Humanitarian Action (PAH). The primary motivation behind our efforts is the humanitarian imperative that there must be a response to human suffering in any circumstances.
2. PAH and its personnel respect the dignity of every human being regardless of their race, origin, religion, gender, sexual orientation, colour of skin, language, financial situation, political beliefs, disability, position, educational background, age and other distinctive characteristics. PAH and its personnel respect the culture, customs and traditions of all nations and avoid any conduct unacceptable in a given cultural context.
3. PAH staff members approach each person in need with respect while demonstrating understanding, tolerance and discretion, and aim for the fullest possible involvement of the individuals, families and communities they aid in the process of making decisions affecting their life.
4. PAH personnel acts with integrity and fairness with the best interest of the persons in need and that of the organization in mind. PAH and its personnel operate in a transparent manner and do not engage in cooperation with the entities that do otherwise. PAH staff members communicate outside the organization and with one another in a clear and truthful manner.
5. PAH personnel acts professionally when providing aid, also when dealing with its humanitarian partners, institutional donors, private donors and other stakeholders. PAH staff members continuously enhance their competences, bring their knowledge up to date, observe procedures and strive to work to the highest standards.
6. PAH employees establish constructive working relations outside the organization and between one another in an effort to understand and address the needs and points of view of other persons. PAH staff members place the welfare of persons in need and the good of the organization above their own ambitions and feel responsible for generating the highest possible quality when carrying out PAH activities.
7. PAH and its personnel continuously strive to improve the effectiveness and efficiency of their activities by creating an environment that supports acquisition of knowledge and implements the lessons learned. PAH actively includes beneficiaries in its actions at each step regarding the beneficiary's interest, makes sure the beneficiary knows their rights, has access to information and can give their opinions regarding the provided aid.
8. PAH staff members do not waste their own or third-party tangible and intangible assets while managing the resources placed at their disposal with utmost diligence. PAH personnel recognizes the importance of incorporation of the environmental aspect in the process of delivery of humanitarian aid.

The full content of the policy is available in "Code of Conduct".

IMPARTIALITY  
BEZSTRONNOŚĆ

EFFICIENCY  
EFEKTYWNOŚĆ

ACCOUNTABILITY  
ODPOWIEDZIALNOŚĆ

TRANSPARENCY  
TRANSPARENTNOŚĆ

COOPERATION  
WSPÓŁPRACA

HUMANITY  
HUMANITARYZM

INTEGRITY  
UCZCIWOŚĆ

EFFECTIVENESS  
SKUTECZNOŚĆ

NEUTRALITY  
NEUTRALNOŚĆ

RESPECT  
SZACUNEK

PROFESSIONALISM  
PROFESJONALIZM

INDEPENDENCE  
NIEZALEŻNOŚĆ

II.

POLICY  
FOR PREVENTING  
CORRUPTION  
AND FRAUD

---



## II.

# POLICY FOR PREVENTING CORRUPTION AND FRAUD

As an organisation whose operations rely on the trust of donors and beneficiaries, which takes advantage of public funds to fund its operations and which follows humanitarian values, the Polish Humanitarian Action attaches great importance to counteracting corruption and detecting any violations in that regard.

Transparency International defines corruption as “the abuse of entrusted power for private gain”. Corruption is any situation when someone is taking advantage of their function or position to satisfy somebody else’s expectations, and receives undue advantages in return. Corruption also takes place whenever someone wants to achieve something and promises, proposes and gives a financial benefit, a personal advantage or any other advantage to a public official or a key function holder in order to achieve that goal.

Please note that, since corruption takes many forms, it does not need to be financial or have a specific limit. Bribery (giving/ accepting/ requesting a financial advantage) is the most frequent form of corruption. In case of corruption, it does not matter who offers the advantage and who accepts it. Nepotism and cronyism are other most frequent forms of corruption as ways of providing favours, mainly a job, to family members or friends. We are strongly against all forms of such misconduct.

Fraud is an offence of intentionally deceiving someone in order to gain an unfair or illegal advantage. As a dishonest practice, fraud causes losses to the organisation and its beneficiaries.

The Polish Humanitarian Action follows zero-tolerance approach to any abuse, corruption or fraud. The rule applies to staff members, volunteers, subcontractors and partners. We say “no” to all types of corruption. We strive to ensure work transparency and we expect the same from our fellow workers, partners and counterparties/ suppliers.

The full content of the policy is available in “Policy for Preventing Corruption and Fraud”.



# III.

## POLICY CONCERNING PROTECTION AGAINST SEXUAL EXPLOITATION, ABUSE AND SEXUAL HARASSMENT

---



### III.

# POLICY CONCERNING PROTECTION AGAINST SEXUAL EXPLOITATION, ABUSE AND SEXUAL HARASSMENT

The purpose of the policy is to ensure that PAH will take all actions necessary in order to prevent sexual exploitation and abuse and sexual violence of beneficiaries by its staff and also in employment relations. Its purpose is also to ensure that PAH will respond adequately to incidents it could not have prevented.

Sexual exploitation and abuse is any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from sexual exploitation of another.

In addition, it is our goal and our duty to investigate into such abuse in a reliable manner, and to provide the victim with care and the whistleblowers with protection.

In order to achieve the above goals, PAH follows the rules in line with the inter-agency policy of the United Nations Standing Committee for protection from sexual exploitation and abuse in humanitarian response:

1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defence.
3. Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are strictly discouraged. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, s/he must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers/volunteers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their codes of conduct. Managers at all levels have particular responsibility to support and develop systems which maintain this environment.

The full content of the policy is available in "Policy Concerning Protection Against Sexual Exploitation, Abuse, and Sexual Harassment".

# IV.

## POLICY REGARDING THE SYSTEM OF COMBATING MONEY LAUNDERING AND TERRORIST FINANCING

---



# IV. POLICY REGARDING THE SYSTEM OF COMBATING MONEY LAUNDERING AND TERRORIST FINANCING

Money laundering is understood as introducing proceeds from a criminal activity (money or other assets) into legitimate financial channels.

Terrorist financing in our understanding stands for the transfer of proceeds (financial and non-financial ones) to persons/ organisations in order to support terrorist organisations and/ or to fund a terrorist-related offence.

As a humanitarian organisation, the Polish Humanitarian Action acts with transparency and integrity, and therefore it does not permit any possibility of cooperating with criminals or terrorists.

For that reason, the Management Board adopted the Counteracting Money Laundering and Terrorism Financing Procedure at PAH. According to the risk assessment analysis, the geographies in which the Polish Humanitarian Action operates, and the types of local partners with which PAH cooperates are exposed to high risk of money laundering and/ or terrorism financing. As a consequence, PAH applies adequate financial safety measures set out in the Procedure.

The purpose of the said Procedure is to define the Foundation's policy to counteracting money laundering and terrorism financing insofar as the Foundation accepts or makes cash payments equal to or exceeding EUR 15,000, whether as a single operation or several operations that seem to be related, and to define the tasks in order to implement the relevant provisions.

The full content of the policy is available in "Policy Regarding the System of Combating Money Laundering and Terrorist Financing".

V.

CHILD PROTECTION  
APPROACH

---



## V. CHILD PROTECTION APPROACH

PAH does not have a separate policy for children protection because children and youth are not the main target group of its beneficiaries. Nevertheless, PAH considers the protection of children and minors to be an issue of great importance for its operations, so much so that the issue has been emphasised in several internal documents of PAH, including but not limited to the following:

1. the Code of Conduct, item 2 which reads that "PAH and its personnel respect dignity of every human being regardless of their race, origin, religion, gender, sexual orientation, colour of skin, language, financial situation, political beliefs, disability, position, educational background, age and other distinctive characteristics".
2. PAH Strategy which lists children and their rights among the following beneficiary groups: "We provide assistance to communities afflicted with humanitarian crises (calamities, armed conflicts), persecution and poverty, in order to ensure them with the right to live in decent conditions and development opportunities. We focus in particular on children, women, refugees and Internally Displaced People (IDP)".
3. PAH Employee Work Regulations §33.2 which reads as follows: "The Foundation does not employ underage employees".
4. Policy concerning Protection against Sexual Exploitation, Abuse and Sexual Harassment which references the 2nd rule of Protection from Sexual Exploitation and Abuse, or PSEA - the inter-agency policy of the United Nations Standing Committee for protection from sexual exploitation and abuse in humanitarian response: "Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defence".
5. Rules of conduct for tenders organized by PAH; Appendix 2 - Offeror/ candidate self-certification which must be signed by each potential counterparty; sub-chapter 4 of the chapter on Work Standards which reads: "No minors should be hired. In order to make the statement more specific, "employment of minors" is defined as any work that deprives the minors of their childhood, their growth potential and dignity; that is harmful for their physical- and mental development. There should be no recruitment for children; persons under the age of 18 must not work at night or in hazardous conditions, including but not exclusive to performance of work that may threaten their physical, mental or moral health, their safety or morality". The above statement is also cited in subsequent standard documents that PAH uses when cooperating with counterparties: Construction Works Contract, Sourcing Contract, or Services Contract.
6. the Code of Practice with Images and Messages which contains a provision that photographs of children published by PAH and taken by employees or hired photographers are first analysed by PAH Communication Team to check whether they may have a negative impact on the child's dignity.

PAH also addresses the rights and needs of children and teenagers in its educational activities, including education of the Polish society. One of the areas on which PAH focuses in its operations is "organising educational activities for children and teenagers, cooperating with government and non-government educational institutions in Poland and other countries, and attempting to account for humanitarian and global education in the applicable education method in Poland". As part of educational programmes, PAH always strives to ensure materials that are of high-quality in terms of content, and that the participation in classes is voluntary. PAH also makes sure that healthy food is served during the meetings with children and that the data of children/ teenagers, including their images, are protected. Empowering the students and talking about the student rights is of key importance during educational classes. This goal is achieved, among other things, through the work with the teacher in charge of the classes, making him/ her aware of the children needs and rights, using language of equality during the classes with children. PAH always responds to violation of children's rights and the Code of Practice with Images and Messages concerning the countries of the South recognised as part of cooperation with Grupa Zagranica.

In Poland, PAH also carries out *Program Pajacyk* to provide meals to school children from poor families. As part of that programme, PAH makes sure that the children recruitment process for the programme is effective, and that their images and data are protected. It also takes efforts to keep the necessary confidentiality, maintain the high quality of assistance and empower the children (regardless of the opinion their parents and teachers may have on them).

VI.

PAH'S SECURITY SYSTEM

---



# VI.

## PAH'S SECURITY SYSTEM

As a responsible employer, PAH takes whatever action is necessary to protect the lives and health of its employees and their property. The specific character of humanitarian organisations consists in their working in countries where the social, political or economic situation is complicated. Human life is the highest value. It is superior to the protection of material goods, pursuit of project objectives and other motives. The security of personnel allows them to work more effectively for the people in need, and is a prerequisite for fulfilling the statutory duties of humanitarian aid organisations.

The Security System of the Polish Humanitarian Action has been developed to ensure the security of employees and volunteers working on foreign missions. It is a set of internal regulations of conduct for all levels of the organisation concerning security issues and good practice. It consists of:

- Security Policy
- Security Manual and related documents
- Security Plans for each mission

PAH takes every effort to ensure that each person who goes on a foreign mission receives a proper training course on safety and security and knowledge on how to act in dangerous areas or in situations of direct danger to life. To regulate those issues, we developed the System of preparation for work at PAH foreign missions.

In addition to its main purpose which is the protection of the employees, volunteers and property of PAH, the effective PAH Security System is to ensure that work is provided in a safe manner and to take actions so as not to expose our Beneficiaries to immediate danger and, wherever possible, to protect the Beneficiaries from the loss of life or health.

The full content of policies is available in "PAH Security Policy", "PAH Security Manual and related documents" , "Security Plans" for each mission.



# VII.

## CONFLICTS OF INTEREST

---



## VII.

# CONFLICTS OF INTEREST

A conflict of interest is a situation when an employee has a private interest that influences, or seems to influence, unbiased and objective performance of his/her job duties, or which may have a negative influence on the organisation's reputation or may lead to other forms of corruption-related behaviours.

A conflict of interest is also a situation where an employee/ volunteer/ partner may refer to PAH to take advantage of his/her function in order to achieve personal gain or another advantage, and the activities he/she takes at work and outside of work may be in conflict with the foundation's interest.

In order to minimise the risk of conflict, Management Board of PAH enacted the Conflict of Interest Policy which contains clear definitions and examples, and sets out the procedure in case of a conflict.

Employee's failure to give notice of a conflict of interest can be grounds for disciplinary measures.

The full content of the policy is available in "Conflict of Interest Policy".

# VIII.

## COMPLAINTS SYSTEM AT PAH

---



# VIII.

## COMPLAINTS SYSTEM AT PAH

There are three levels of grievance submission and review at PAH:

- 1. Global Complaints Mechanism** which is serviced from the HQ level (the Warsaw office) and which may be used in particular by all employees, partners, counterparties and other persons who would like to report any misconduct, irregularities or violation of law at PAH. The mechanism is available on our website at: [www.pah.org.pl/en/complaints/](http://www.pah.org.pl/en/complaints/). The form is available in Polish and English. Complaints and grievances may also be submitted verbally or in writing to direct supervisor or to the Compliance Manager at: [compliance@pah.org.pl](mailto:compliance@pah.org.pl).
- 2. Staff Grievance Mechanism**, where all PAH employees may submit all grievances concerning their employment relationship directly to the HR Team via in-house channels.
- 3. Beneficiary Complaints Mechanism** which is serviced by the MEAL Team (Monitoring, Evaluation, Accountability & Learning) at the mission level. All complaints and grievances are submitted at the mission level, directly by the Beneficiaries who wish to report a misconduct or their dissatisfaction from the quality of assistance received. The register of grievances is kept by the MEAL Coordinator/Manager at the level of a given mission. The Global MEAL Manager oversees the correctness of their review.

The full content of the policy is available in "Global Complaints Mechanism", "Staff Grievance Mechanism", "Beneficiary Complaints Mechanism".

MECHANISM	WHO MAY SUBMIT A GRIEVANCE	TYPE OF GRIEVANCES	FORM	RESPONSIBLE PERSON
Global Complaints Mechanism (HQ)	all	sensitive issues, programme-related issues, financial fraud, other violation/ breaches of law or PAH procedures	on-line form on the website, e-mail, written, verbal	Compliance Manager (HQ)
Staff Grievance Mechanism	Employees/volunteers	employee-related	on-line form on the intranet, written, verbal	HR Manager (HQ)
Beneficiary Complaints Mechanism	beneficiaries	programme-related, misconduct	any form that is convenient for the beneficiary: verbal, written, by phone	MEAL Coordinator/ Manager at the level of the mission and/or Global MEAL Manager (HQ)

# IX.

## PAH PROCEDURE IN THE EVENT OF SUSPECTED BREACH

---

(INTERNAL INVESTIGATION PROCEDURE)

A large, stylized, light blue apple logo is positioned in the bottom right corner of the page. The logo is composed of several overlapping, rounded shapes that form the outline of an apple, including a stem and a leaf. The color is a lighter shade of blue than the background.

# IX.

## PAH PROCEDURE IN THE EVENT OF SUSPECTED BREACH (INTERNAL INVESTIGATION PROCEDURE)

Each case of abuse or fraudulent conduct must be documented properly. To achieve that goal, PAH takes actions in reliance on the following internal procedures:

- The Global Complaints Mechanism to receive notifications which are processed as ordinary complaints and grievances. The Compliance Manager keeps records of and manages complaints and grievances, and reports to the PAH Management Board on their number and nature (subject to confidentiality obligation).
- The internal investigation procedure which sets out the rules of procedure when dealing with an ordinary complaint that seems to refer to abuse on a larger scale, as a result of which the PAH Management Board resolves to appoint a Fraud Response Team and initiate an internal investigation.

The final report is prepared after each internal investigation and describes the course of the investigation, the conclusions and steps taken, as well as recommended systemic solutions for the organisation so as to avoid such situations in the future. The principle “innocent until proven guilty” applies until the case is finally resolved.

The whistleblower is subject to protection and is provided with all support needed.

Should the PAH Management Board decide that a crime has been committed subject to prosecution, the Management Board shall notify the relevant national law enforcement bodies pursuant to procedures under law. However, the decision of the Management Board may be influenced by special circumstances relating to the safety of human life due to the specific context in which the Foundation operates.

The full content of the policy is available in “Internal Investigation Procedure”.

X.

EMPLOYEE TRAINING  
AND DISCIPLINARY  
ACTIONS

---



# X.

## EMPLOYEE TRAINING AND DISCIPLINARY ACTIONS

All staff members employed at PAH undergo a training course on the Safeguarding Policy. Each new hire undergoes a training course on key policies conducted by the Compliance Manager as part of the onboarding session. There are also regular refresher courses for all PAH employees, coupled with communication campaigns on a given topic. The Compliance Manager is responsible for those training courses at the HQ level. The mission heads are responsible for the training on the mission.

Each employee signs a statement wherein they confirm that they have read and understood the Code of Conduct of the Polish Humanitarian Action along with appendices, and that they have accepted the values and behaviours described therein. Furthermore, they undertake to adhere to the Code in their daily work with the Beneficiaries, co-workers, partners and external institutions, and they shall report any abuse without undue delay. They also acknowledge that any breach of the rules set out in the Code is subject to disciplinary measures, up to and including summary dismissal. Staff members also sign a statement on zero tolerance to corruption and sexual exploitation and abuse.

Whenever there is a breach of the rules set out in the internal documents of the Polish Humanitarian Action and it is confirmed that there are reasonable grounds for such decision, PAH may terminate the contract with the employee with immediate effect.

Furthermore, whenever there are reasonable grounds for such decision, the PAH Management Board shall in each case have the right to impose a penalty for breach of order or a fine under the applicable laws and under PAH's Internal Bylaws, see: DISCIPLINARY ACTIONS.

The full content of the policy is available in "System of training Safeguarding", "Disciplinary Action".

The PAH Management Board may require the offender to redress the damage inflicted to the Foundation or to a third party.





---

Polish Humanitarian Action  
al. Solidarności 78A, 00-145 Warsaw

[pah@pah.org.pl](mailto:pah@pah.org.pl), tel. 22 828 88 82  
[www.pah.org.pl](http://www.pah.org.pl)