

**Ethio Wetlands and Natural Resources Association
(EWNRA)**



Code of Conduct and related policies

Programme/project Participant Protection Policy

Child Safeguarding Policy

Anti-Trafficking in Persons Policy

Approved by	EWNRA Board
Date Issued	January 2023
Place	Addis Ababa, Ethiopia

Ethio Wetlands and Natural Resources Association (EWNRA)

CODE OF CONDUCT

1. Introduction

Ethio Wetlands and Natural Resources Association (EWNRA) is a local/ National non-governmental organization dedicated to poverty reduction, enhancement of resilience and creation of productive ecosystems creation and biodiversity conservation. EWNRA strives to implement effective development projects through its commitment to meeting good practice standards, and the quality of the work of its staff and those of its donor and back donors organizations interest.

Prior to the development of this code of conduct, EWNRA staffs in all its intervention areas have been exercising their power in responsible manner and built strong trust by using organizational rules and regulations embedded in human resources management, Procurement, Finance, Accounting and Property, Gender, Culture and Disability Inclusion and several other policy and working documents of the organization. In addition, issues such as safeguards, fairness, fraud, abuse of human rights and related issues have been announced as zero tolerance areas and given to staffs during employment to sign and the signed copies attached in staff personal file.

However, through time its' geographical and intervention thematic areas, partners and scope widened to address the communities. These new developments and the global condition of partnership required standalone policies in various areas and disciplines. EWNRA staffs work in different situations and positions with power. In relation to beneficiaries, other organizations and one another, their position and power must never be abused. Thus, all EWNRA staff will have a commitment and take responsibility to conduct each day to day activity of their work in an ethical, legal, trustful and consistent manner with the organization's values and mission. Any form of prohibited behavior is incompatible with EWNRA's fundamental belief in the human dignity of all people, and with our core values.

A code of conduct is a set of norms, principles and values to standardize the conduct, action and behavior of one non-governmental organization employees to ensure protection and enhance its' assistance to the people in need by preventing harassment, exploitation, abuse and/or prohibited behavior by staff. To meet its aforesaid importance of code of conduct and fulfill its donors' requirement EWNRA developed this Code of Conduct and its associated policies – the Programme Participant Protection Policy, the Child Safeguarding Policy, and the Anti-Trafficking in Persons Policy.

The Code of conduct provides guidance and framework regarding the standard of behavior expected from all staffs, anyone working with EWNRA (General assembly members, Board members,

Volunteers, Consultants, contractors, input supplier, product buyers, others service providers and visitors) in its' work place and projects intervention areas. Moreover, it will also provide standards of behavior it requires from all its' staff and anyone working with it and obliged to abide as they are considered unacceptable. Thus, any breach of this Code of conduct may result in disciplinary action on its staff based on its' HRM policy and suspension or termination of its contract agreement with those organizations working with it to maintain its organizational core values and commitment to address community in need.

All EWNRA staff, organizations working with EWNRA, volunteers as well as visitors must be given a soft copy of this Code and its associated policies and an orientation before engagement. They must confirm that they have read them, understood their content, and that they agree to conduct themselves in accordance with them.

2. Purpose

EWNRA code of conduct provide guidance and framework regarding the standard of behavior expected in its' work place and projects intervention areas. In accordance with its code of conduct all is staffs and its work place participants in all its projects are responsible for their conduct, decision making and actions. If this doesn't occur, EWNRA is committed to address the raised issues in an appropriate and timely manner.

The code of conduct provides guidance regarding acceptable behavior, how to raise concerns and seek support and what can happen if the code is breached. Moreover, EWNRA is committed to support its entire projects participant in all its intervention area to adhere to the code of conduct recognizing that maintaining professionalism and conduct will contribute for the success of its projects and reputation of the organization.

3. Scope

This Code of Conduct applies to any person who is employed by EWNRA and engaged in any capacity (permanent, temporary, full time, part time, casual) as well as General assembly members and Board members,. Moreover, it also applies to anyone working with EWNRA (Volunteers, Consultants, contractors, input supplier, product buyers, others service providers and visitors). Geographical application of the Code of conduct is extend from EWNRA head office to any location where EWNRA intervene with its projects at any time. This includes but not limited:-

- At head office, projects coordination offices, project office and sub offices
- When Working at home or remotely
- While traveling including in Vehicle, airplane etc.
- Work/ projects imitative events / workshops

4. Standards of Conduct

4.1. As a staff member of EWNRA I commit myself and responsible to:

4.1.1. Respect and Dignity

- a) I will respect all persons equality and without any distinction or discrimination based on such as, but not limited to, their gender, race, religion or lack of religion, colour, 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, lifestyle, or other status.
- b) I will, in all of our projects, 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 respect national and regional laws, customs and habits of local culture and behave in a culturally sensitive manner.
- d) I will keep myself informed about EWNRA policies, objectives and activities and about the communities in need and will do my utmost to support EWNRA protection and assistance work.
- e) I will never engage in any humiliating, degrading or exploitative behaviour.
- f) I will not use or condone language that is inappropriate, demeaning, or offensive towards others.
- g) I will not abuse my position as a EWNRA staff member for personal gain by requesting, soliciting or accepting any payment, gift, service or favor (including sexual favors) from others, whether for my personal benefit or for the benefit of another person, in return for support, goods or services.

4.1.2. For Information, Material and Financial resources of EWNRA

- a) I will safeguard and make responsible use of the information, material and financial resources to which I have access by the reason of my employment.
- b) I will handle all EWNRA information, materials and financial resources with the utmost care , safeguard those at all time against theft or other damage , keep and maintain them properly and ensure unauthorized and unethical use as well as misuse for personal does not occur.
- c) I will not use office, EWNRA property or knowledge gained from functions with EWNRA for private gain, financial or otherwise, or for the private gain of any third party including family, friends or those they favor.
- d) I am committed to, both while working for and after leaving EWNRA , not to leave any confidential information I have obtained while working for EWNRA to any third party.
- e) I will not use EWNRA computer equipment, other technology social media channel to view, download, create, distribute, or save in any format prohibited material, including but not limited to adult or child pornography as well as any activity that is illegal under regional, National, or international law, or that encourages conduct that would constitute a criminal offence.

- f) I will protect, manage and utilize EWNRA human, financial and material resources efficiently and effectively as each and every penny is allocated to the community in need by EWNRA esteemed donors.
- g) I will exercise due care in all matters of official business and not release any confidential information of the organization and its' beneficiaries to others.

4.1.3. For my health, safety and welfare, as well as staff whom I manage

- a) I will adhere to all organizational health and safety regulations and procedures as well as promote and in force in my work place as necessary condition for effective and consistent performance.
- b) I will behave in ways that avoid creating unnecessary risk to the security, safety, health and welfare of me or others (staff whom I managed and beneficiaries).

4.1.4. Avoid possible conflict of interest.

- a) I will perform my official duties and conduct my private affairs in a manner that avoids conflict of interest, thereby preserving and enhancing public confidence in EWNRA.
- b) I will work to serve the mandate, objectives and values of EWNRA and ensure that personal views, behaviors and beliefs including political and religious opinions, do not adversely affect official duties and activities performed on behalf of EWNRA.
- c) I will avoid situations where my personal interests could conflict, or reasonably appear to conflict, with the interests of EWNRA. Therefore, I will not enter into any sort of business relationship on behalf of EWNRA with family members, friends or other personal/professional contacts for the supply of any goods or services to EWNRA or any employment related matters without authorization from senior management. I will declare any potential conflict of interest to my line manager.
- d) 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.
- e) I will not accept bribes or gifts (except small tokens of appreciation) or any remuneration which have been offered to me as a result of my employment with EWNRA by governments, beneficiaries, partners, suppliers or any other persons. I will notify my line manager if I am offered or have received gifts of any kind.
- f) I am aware that sexual relationships between a EWNRA staff member and a beneficiary are likely to involve an imbalance of power and will undermine the credibility of the organization and its work. I know that EWNRA prohibits such sexual relationships.¹
- g) I will not undertake work or duties outside of EWNRA that negatively influence my ability to perform my function, or which may have a negative impact on the work of EWNRA.

¹. EWNRA recognizes that staff are often members of the communities in which we deliver our programmes, and may have or develop relationships with other members of those communities. To ensure that beneficiaries are protected, and to protect EWNRA staff and the organization from allegations of biased or more favorable treatment being given to some members of the community than others, EWNRA staff must make any such relationship known immediately to the senior manager in her/his project area.

4.1.5. Avoid involvement in any activities that are illegal, contravene human rights.

- a) I will ensure full compliance with EWNRA's Anti-Trafficking in Persons Policy and will not take part in or support any illegal activities, particularly in relation to the trafficking of persons.
- 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) Consistent with EWNRA's Child Safeguarding Policy, I will always consider and act in the best interests of children in all actions relating to them. I will not abuse or exploit children or adults in any way and will report any such behavior by others to EWNRA head office Finance and Administrative director or Executive Director
- d) I will have no involvement in criminal and unethical activities that contravene human rights, or activities that compromise the image and interest of EWNRA.

4.1.6. Report any incident, concern or suspicion regarding any breaches of this Code

- a) I will bring to the attention of the relevant manager or the Human Resources manager within EWNRA any potential incident, abuse or concern 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 or its associated policies against any programme participant.
- c) I will ensure that all information about breaches of this Code and its associated policies is handled with the utmost discretion.

4.1.7. Especially for Managers²:

- a) As a manager I have particularly responsibility to set a good example when it comes to my behavior both on and off duty.
- b) I will not encourage in or tolerate any form of harassment in the workplace, including but not limited to bullying, sexual harassment and abuse of power.
- c) As a manager I will endeavor to ensure that the health and well-being of staff are not subjected to undue risk.
- d) As a manager, I will not solicit favors, loans or gifts from staff, nor will accept unsolicited ones that are of more than token value.
- e) I recognize that there is an inherent conflict of interest and potential abuse of power in having sexual relations with EWNRA staff and volunteers. Should I find myself in such a relationship, I will advise my immediate manager immediately and resolve this conflict of interest without delay.

4.1.8. For all:

I have a duty to inform beneficiaries and others with which EWNRA works, of the code of conduct to which EWNRA staff must adhere, including how and to whom they can report any misconduct or failure committed by EWNRA staff or anyone representing EWNRA.

I have read carefully and understood the **EWNRA Code of Conduct** and its associated policies and agree to abide by their requirements, and commit to upholding the standards of conduct required to support

² Managers are the Executive Director, Programme Director and Finance and Administrative director that make the management body of the organization. In addition field level project office coordinators and Forest program coordinator are included.

EWNRA's core values and mission.

I understand that failure to comply with any **principles of the EWNRA Code of Conduct or its associated 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:.....



Programme/project Participant Protection Policy

January 2023

1. Introduction

EWNRA strives to ensure responsible power utilization by its employee in relation to the beneficiaries at all level, as it provides goods and services in all its projects' through cooperatives using pertinent key stakeholders starting from beneficiary selection in participatory manner.

However, provision of goods and services through our development projects and relief programmes can create an imbalance of power between those who are employed or engaged by EWNRA and other projects/programme participants. We acknowledge that there is potential for this power imbalance to be exploited by our staff to acquire bribes, payments, gifts, and/or sexual favors.

Projects/ programme participants" include beneficiaries of EWNRA programmes/ projects and other community members where it work, as well as EWNRA staff, volunteers, interns, contractors, visitors, government partners, and other project stakeholders.

Thus, this policy is developed to ensure the maximum protection of EWNRA project /programme participants, especially beneficiaries, from abuse and exploitation, and to clarify the responsibilities of the staff of EWNRA and anyone engaged by EWNRA or visiting our programmes, and the standards of behavior expected of them.

Programme/ projects participant is any individual associated with EWNRA's programmes/ projects and includes:

- beneficiaries of programmes/ projects delivered by EWNRA or its partners
- people employed or engaged by EWNRA, full or part time, consultants, interns, contractors or volunteers, or any person actively involved in the programmes/ projects of EWNRA

The imbalance of power leads to an increased risk of abuse and exploitation within the humanitarian and development sector. EWNRA prohibits any abusive or exploitative behavior and is committed to the protection of its programme participants, particularly the beneficiaries, as they are the most vulnerable. Abuse of power can lead to many forms of exploitation and inappropriate and unacceptable behavior, such as:

- Bullying
- Verbal, physical or sexual harassment
- Rape
- Exploitation
- Intimidation
- Victimization
- Racial or ethnic discrimination or harassment
- Behavior that shows a lack of respect for the dignity of others
- Behaving in an obviously culturally insensitive manner
- Attempt to commit fraud, blackmail or to accept or solicit a bribe

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

2. Definition

Child: An individual below the age of 18 years.

Visitor: Any individual who visits EWNRA programme/projects and comes into contact with EWNRA participants.

Harassment: Any act or conduct including verbal and written if the conduct is unwelcome to the recipient and could reasonably be regarded as offensive, humiliating, or intimidating. Examples include: ridicule; shoving or assault; etc.

Sexual harassment: Is an act of physical intimacy; request for sexual favors; verbal or written communication or gesture that could reasonably be regarded as sexually offensive, humiliating, or intimidating.

Participants: “Participants” include beneficiaries of our programmes/ projects and other community members where we work, as well as government partners, and other project stakeholders like consultants, contractors, volunteers, interns, or any person actively involved in the EWNRA programme/ project

Rape: An act of non-consensual sexual intercourse. This includes Statutory Rape, which is sexual intercourse with a person under the legal age of consent, even if the person agrees to the act.

Exploitation: Is using one’s position of authority, influence or control over resources, to pressure, force or manipulate someone to do something against their will. This includes for example threatening to withhold project assistance from a beneficiary, threatening to make false claims about a person in public, or any other negative repercussions in the work place or community.

Violence: Includes incidents where a person is abused, threatened or assaulted in circumstances related to their work, involving an explicit or implicit challenge to their safety, health and wellbeing.

Intimidation or victimization: Retaliation against a person making a complaint or assisting in an investigation against another

3. EWNRA’s policy

All programme/ projects participants have the right³ of freedom from abuse and exploitation. Thus, EWNRA’s has developed this policy to take all reasonable steps to ensure their right /protect all them particularly beneficiaries - children, women and men - from harassment and abuse perpetrated by:

- staff of EWNRA
- Anyone working on behalf of EWNRA
- people engaged by EWNRA such as consultants, contractors, volunteers, interns, or any person actively involved in the EWNRA programme/ projects
- visitors to EWNRA’s programmes/projects

EWNRA acknowledge that certain groups, such as children (individuals under 18 years of age) and women are often most at risk from abuse, harassment, physical and sexual violence. EWNRA will ensure that its programmes/ projects will always take into account the situation of children, the specific protection risks and issues that they face and address these as far as possible. We will not tolerate anybody employed by or working with us harming children.

³ See: <http://www.ohchr.org/EN/ProfessionalInterest/Pages/CoreInstruments.aspx>

4. Scope of this policy

EWNRA has a zero tolerance approach to abuse. Specific wording has been developed for inclusion in contracts with employees, consultants, contractors, volunteers, interns, or any person actively involved in the EWNRA programme/ project and is set out in the Programme/projects Participant Protection Policy Guidelines. The wording in the contracts confirms that the relevant individual/party has read, understood and agreed to abide by and promote the terms of the EWNRA Code of Conduct and its associated policies. Any finding of prohibited behavior by a EWNRA staff member or anyone working for or on behalf of EWNRA, will lead to disciplinary action up to and including dismissal.

For agreements with contractors and consultants, it should be included as a pre-condition of any contract if the sated actors will be in direct contact with EWNRA's beneficiaries as a result of their work for EWNRA. Moreover, it will do its utmost to ensure that all participants comply with this policy. However, it cannot be held responsible for the actions of any third parties if they breach this policy.

5. Abuse of power and sexual exploitation

- EWNRA 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 the organisation's core values.
- EWNRA staff and anyone working with or for EWNRA must never engage in any form of humiliating, degrading, abusive or exploitative behaviour under any circumstances.
- EWNRA prohibits the exchange of money, employment, goods or services for sex (including sexual favours or other forms of exploitative behaviour). This explicitly includes exchange of assistance that is due to beneficiaries.
- EWNRA believes that engaging in commercial sexual transactions⁴ is contrary to its core values and undermines the work and reputation of the organization as 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 EWNRA must respect the rights and dignity of the children, families and communities with whom we work and/or with whom we have contact, and should always act in the best interest of these children, families and communities.
- Any type of 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 regarding the age of a child is not a defense.
- To be fully aware of the issues faced by EWNRA in relation to the protection of programme participants, it is essential for all staff to be aware of local cultural and religious practices. EWNRA 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 prohibited behavior. EWNRA will not accept using respect for local culture as a justification for supporting or failing to report harmful practices.

⁴ For the purpose of this policy, a 'transaction' is defined as any exchange of money, goods, services or favours with any person

6. Preventive measures to reduce the potential for abuse

Abuse of power is often at the base of incidents of harassment, exploitation and other forms of prohibited behaviour. The following are considered to be measures to reduce the potential for such abuse, and it is the responsibility of Executive Directors to ensure that these measures are taken, and that they address the situation of all programme participants, including children, by:-

- As far as possible, ensuring teams are gender-balanced at all functions and 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 project coordination offices and project offices to train all staff members and raise awareness of the content of the policy, and the EWNRA Code of Conduct among all programme participants.
- All staff, consultants, contractors, volunteers, interns, or any person actively involved in the EWNRA programme/ project must have a soft copy of the Code of Conduct and new staff induction must include briefing.
- Raise participant protection issues with staff, informing them that they will be expected to read through this Code of Conduct and sign an agreement to follow it.
- All staff must be made aware that they must adhere to the Code of Conduct, and that they are responsible for reporting any concerns to their line manager and/or ED, if they feel that there are any staff members not complying.
- Every workplace will display the Code of Conduct and every member of staff will have contact details for reporting.
- Making all beneficiaries aware:
 - That they are entitled to assistance and ensuring clear messaging in relation to: beneficiary selection criteria; the quantity and variety of items that they should receive; when and how the distribution is taking place (day, time, location, method); etc.
 - That the staff of EWNRA have a duty to deliver assistance without any demands or form of discrimination
 - That goods and services delivered cannot be withheld or withdrawn by staff members or those working on behalf of EWNRA
 - That it is unacceptable for the staff or those working on behalf of EWNRA to solicit or accept bribes, rewards, gifts, or sexual favors from a beneficiary
 - of the standards of behavior expected of staff and those working on behalf of EWNRA
 - of the channels that they can use to raise complaints about the failure of the staff of EWNRA to adhere to these standards .

Particular consideration needs to be given to ensuring the accessibility of this information. This may require its translation into different languages, the use of picture based information, or ensuring that children can understand the language being used.

It is the responsibility of all project managers at field and head offices, Finance and Administrative director, Program Director and Executive Director to ensure that all EWNRA staff, consultants, contractors, beneficiaries and visitors to EWNRA programmes/ projects are informed about and agree to adhere to the requirements of this policy.

If acts have been committed in relation to our programme participants which are criminal, infringe on 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. This may mean for:-

Staff or those working for or on behalf of EWNRA	Disciplinary action up to and including dismissal
Volunteers	Action up to and including termination of appointment
Contractors/Consultants	Termination of contract
Visitors to EWNRA	Appropriate action up to and including suspension of support for the visit

Any action taken will be in accordance with EWNRA’s policies and procedures and informed by national laws. Depending on the nature and circumstances of the case, EWNRA will involve the appropriate authorities, including the Federal Authority for Civil Society Organizations (ACSO), to ensure the protection of all programme participants and the transparency of our safeguarding processes.

7. Relationships with beneficiaries

Power imbalances between those working for EWNRA and members of the communities due to potentially greater access to goods, services by those working for EWNRA increase the opportunities for beneficiaries to be placed in exploitative positions.

Sexual relationships between a EWNRA staff member and a beneficiary are likely to involve an imbalance of power and will undermine the credibility of the organization and its work. Thus, EWNRA prohibits such sexual relationships.

We recognize that EWNRA staff is often members of the communities in which we operate, and therefore may have or develop relationships in those communities. To ensure that beneficiaries are protected, and to protect EWNRA staff and the organization from allegations of biased and more favorable treatment being given to some members of the community, EWNRA staff must make any such relationship known immediately to project office coordinators/ project coordinators in the programme/projects implementation area.

8. Duty to report

- Any known or suspected instance of abuse, exploitation, or harassment of programme participants must always be brought to the attention of the Project office coordinators/ project coordinators or the Finance and Administrative department of each projects coordination office or project offices.
- In the event that staff members have concerns related to the behaviour of the projects coordinators, they may raise these concerns directly to the Finance and Administrative Directorate or with CEO.
- The reporting of a concern may result in an investigation being conducted. Such investigations must be confidential, thorough and prompt. They may reduce the level of concern 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 - must be protected against any form of intimidation, threats, reprisal or retaliation resulting from their investigation of the alleged incident. If any member of staff is found intimidating or retaliating against a person making a complaint or conducting 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, and disclosed only on a need-to-know basis to the relevant stakeholders 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 and will result in disciplinary action - up to and including dismissal.

- Any concerns about breaches of these standards of behavior must be handled with the utmost confidentiality, recorded, and details of reported / alleged program participant Safeguarding and Protection policy incidents held in a secure location with the Finance and Administrative Directorate or with CEO.
- If a complaint is made by a EWNRA Staff member against another staff member, EWNRA Grievance procedure may also be used in addition to the above actions.
- 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 authorities for further investigation.
- We may also have to give non-identifying information about any such incidents to our donors to meet our legal or contractual requirements to them.

9. Review

The implementation of this policy will be monitored through monitoring. The CEO is responsible for ensuring that the policy is communicated during any training , staff induction and before signing agreement with consultant/ contractors and volunteers, and that a complaints and response mechanism is appropriately developed, implemented and monitored. Feedback on progress towards the implementation of this policy must be included in the annual priorities and reports of the organization.

EWNRA 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 the Executive Director (ED).



Child Safeguarding Policy

January 2023

1. Purpose

EWNRA with its generous donors support have been striving to safeguard the wellbeing of men, women, boys and girls and prevent harm, abuse or exploitation, irrespective of ability, ethnicity, faith, gender, sexuality or culture for the the past twenty three years through its different project without written policy and procedure.

EWNRA acknowledges that certain groups, such as children (individuals under 18 years of age) and women are at greater risk of abuse, harassment, and physical or sexual violence and is applying Zero tolerance to Child abuse. As the inherent power difference between programme/ projects participants (EWNRA staffs and those working with and for EWNRA) and impacted communities heighten the risk of abuse and exploitation of children, EWNRA believed essential to develop and implement this policy that build its reputation.

Thus, EWNRA believes that children deserve particular protection given their potential vulnerability to specific risks. Children have strengths, capabilities and resilience, but their age, developmental stage, level of dependency, status, and lack of power and position in communities, mean that they are more susceptible to violence, abuse and exploitation. Some groups of children, e.g. those with disabilities, may be even more vulnerable.

The safeguarding of children is a key element of the EWNRA Code of Conduct and its associated policies⁵, and this policy must be read and understood in conjunction with EWNRA Human Resources Management manuals. This policy applies to all persons working for EWNRA or on our behalf in any capacity, including employees at all levels, Board members, volunteers, consultants, interns, contractors, third-party representatives, suppliers, and business partners. Any violations of this policy will be treated as a serious infraction and will result in disciplinary action, up to and including termination, and any other available legal remedy. EWNRA representatives must demonstrate the highest standards of behavior and conduct towards children, both in their private and professional lives, 24 hours a day and 7 days a week.

EWNRA knows the importance of creating and maintaining a safe culture that is child-focused and community-driven through sustained and meaningful engagement with children, their families, communities, and EWNRA representatives. EWNRA recognizes that when special trust is exploited and standards for safeguarding children fail, immense damage is caused with long-term effects on the lives of children, their families, and communities, and undermines the credibility and reputation of our organization.

2. Definitions

Children:- a child as anyone under the age of 18 years, regardless of local custom, or the age of majority or consent locally.

Child Abuse:- ‘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’²⁵. The definition highlights five subtypes of maltreatment: physical abuse, emotional abuse, neglect, sexual abuse and commercial or other exploitation of a child.

Child safeguarding: - is the act of making EWNRA safe for children. It involves our collective and individual responsibility and preventative actions to ensure that all children are protected from deliberate or unintentional acts that lead to the risk of or actual harm by EWNRA representatives. Safeguarding is carried out by developing and implementing a set of policies, procedures, and practices to ensure all organizational functioning prioritizes each child’s safety.

⁵ The Programme Participant Protection Policy, the Child Safeguarding Policy and the Anti-Trafficking in Persons Policy

Emotional abuse:- involves doing harm to a child's emotional, intellectual, mental, or psychological development. This may occur as an isolated event or on an ongoing basis. Emotional abuse includes but is not limited to any humiliating or degrading treatment (e.g., bad name calling, threats, yelling/screaming/cursing, teasing, constant criticism, belittling, persistent shaming etc.); failure to meet a child's emotional needs; rejecting, ignoring, terrorizing, isolating, or confining a child; and attacking or minimizing a child's cultural identity.

Exploitation :- is the actual or attempted abuse of a position of vulnerability, power differential, or trust for the benefit of the individual leveraging their position, power, privilege, or wealth (through enticement, manipulation, coercion, or trickery) to engage a child in labor, domestic servitude, forced criminality, soldiering or organ harvesting, or in activity in which a child's dignity is compromised in order for an organization to gain financially or in reputation. Typically, the person(s) exploiting a child does so to profit monetarily, socially, or politically. It can happen to one or a group of a children, in the community of origin, outside of the community, or internationally. The exploitation of a child may include but is not limited to:

- Domestic servitude (e.g., cleaning, childcare, cooking, etc.)
- Taking photos of children in distress or extreme states of malnourishment to gain donations.
- Forced labor (commonly in factories or agriculture)
- Forced criminal activities such as pickpocketing, begging, transporting drugs, manufacturing drugs, selling pirated merchandise.
- Using children for benefit fraud.
- Forcing a child to become a child soldier or join a gang

Neglect: - includes but is not limited to failing to provide adequate food, shelter, or sufficient and seasonally appropriate clothing. Neglect is also failing to prevent harm; failing to ensure adequate supervision; failing to ensure access to appropriate medical care or treatment or providing inappropriate medical treatment (e.g. administering medication when not authorized); or failing to provide a safe physical environment (e.g. exposure to violence, unsafe programming location, unsafe sleeping practices, releasing a child to an unauthorized adult, access to weapons or harmful objects, failing to child-proof a space that children will occupy etc.). It can also be Save the Children staff, partners, contractors, suppliers, and sub-grantees failing to apply minimum requirements as set out in mandatory procedures (e.g., failing to protect a child's personal data).

Physical abuse: - is the non-accidental use of physical force that deliberately or inadvertently causes a risk of/or actual injury to a child. This may include hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing non-accidental physical harm to a child. Physical harm can also be caused when a caregiver fabricates the symptoms of, or deliberately induces, illness or temporary, permanent injury or disability of a child.

Representatives:- include employees, volunteers, interns, consultants, Board and General Assembly members, and others who work with EWNRA, visit EWNRA's programmes/ projects, or who have access to sensitive information about children in EWNRA's programmes/ projects.

Sexual abuse: - is the involvement of a child in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Child sexual exploitation:-is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur with the use of technology. Within Save the Children, child sexual abuse and exploitation also includes child early and forced marriage.

Zero Tolerance:-

At EWNRA, we have a zero tolerance unwritten culture for all forms of abuse and mistreatment.

- ✓ This means that every single concern is fully responded to and where necessary prompt action (including investigating and taking disciplinary action, if applicable) is taken.
- ✓ It means that we will hold all our representatives accountable for the same set of standards. Each representative is subjected to the same processes as everyone else regardless of their position or reputation within the organization.

Generally, in all aspects of our work, EWNRA seeks to promote the key principles of the UN Convention on the Rights of the Child, specifically:

- Guaranteeing, without any form of discrimination, the rights of children
- Considering the best interests of children in all actions relating to them
- Recognizing the right to life, survival and development of each child
- Reflecting children's views in matters affecting them

3. Scope

As with the EWNRA Code of Conduct and its associated policies, this policy applies to all EWNRA staff and to those working for and on behalf of EWNRA, including:

- Anyone working on EWNRA behalf, such as consultants, contractors, volunteers, interns, or any person actively involved in EWNRA's programmes/projects
- People engaged by EWNRA such as consultants, contractors, volunteers, interns, or any person actively involved in EWNRA's programmes/projects
- Visitors to EWNRA's offices or programmes /projects intervention areas

4. Our Approach to Safeguarding

- Training and Prevention
 - All staff, consultants, contractors, volunteers, interns, or any person actively involved in the EWNRA programme/ project must have a soft copy of the Code of Conduct and new staff induction must include briefing.
- Reporting Child Safeguarding Incidents
 - All staff must be made aware that they must adhere to the Code of Conduct, and that they are responsible for reporting any concerns to their line manager and/or ED, if they feel that there are any staff members not complying.

5. Organizational commitments

The prevention of and response to the risk of harm, exploitation and abuse of children, either directly or indirectly, require a variety of measures to be implemented at project coordination offices/ project offices like :-

- Conducting its programs and operations in a manner that is safe for the children it serves and to helping protect the children with whom EWNRA is in contact,
- Representatives are explicitly prohibited from engaging in any activity that may result in any kind of Child Abuse.
- Representatives are expected to create and proactively maintain an environment that aims to prevent and deter any actions and omissions, whether deliberate or inadvertent, that place children at risk of any kind of Child Abuse.
- Any violations of this policy will be treated as a serious infraction and will result in disciplinary action being taken, up to and including termination and any other available legal remedy.
- Representatives must at all times avoid actions that could be construed to constitute potentially abusive behavior; representatives must never place themselves in a position where they are made vulnerable to allegations of misconduct.
- EWNRA management is committed to taking all appropriate corrective actions. Disciplinary, legal, or other applicable actions in response to any violation of the Child Safeguarding Policy will be taken against any individual who has committed a Child Safeguarding violation and/or anyone who knew of such a violation and failed to act or report.

All the aforementioned measures should lead to:-

- A better understanding of the risks facing children and the mitigating actions that should be taken to address these
- The necessary staff behavior, knowledge and skills required to protect children
- Actions in all aspects of the programme cycle being designed and delivered in a way that ensures that the best interests of children are being considered
- Communities being aware of relevant safeguarding policies and knowing how to complain in the event of any infringement of them
- The establishment of a safe system of reporting and management in the event of child safeguarding issues being raised

6. The duty to report

This policy specifically outlines EWNRA's position on child safeguarding, but should be considered in conjunction with the EWNRA Code of Conduct and its associated policies. It is the responsibility of all project coordination offices and project office coordinators at field and head office Management to ensure that all EWNRA staff, consultants, contractors, beneficiaries, and visitors to EWNRA programmes/ project are acquainted with and agree to adhere to the requirements of this policy.

All concerns related to the welfare of a child, or information about an incident or suspected incident of abuse of children involving staff from EWNRA should be reported in accordance with the reporting procedures of EWNRA. In conjunction with the EWNRA Code of Conduct and its associated policies, EWNRA project coordination offices/ project coordinators as well as EWNRA top Management must ensure that all staff is aware of the identity of the safeguarding focal point and relevant internal reporting procedures and external referral pathways.

The reporting of a concern may result in a confidential, thorough and prompt investigation. Such investigations may reduce the level of concern or lead to the realization that further action is necessary. People reporting possible violations and/or involved in such investigations – including the subject of the complaint – must be protected against any form of intimidation, threats, reprisal or retaliation resulting from the alleged incident.

Any intentionally false, malicious or vexatious statement, misrepresentation or accusation against another staff member or third party will be considered gross misconduct and will result in disciplinary action up to and including dismissal.

7. Consequences of misconduct

If acts have been committed in relation to our programme participants that are criminal, infringe individual’s rights, or contravene the principles contained in this statement or the EWNRA Code of Conduct and its associated policies, **EWNRA will take immediate action appropriate to the circumstances and will address the support needs of those involved.** In the event of an allegation that involves a criminal offence, 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. Disciplinary action may include the following measures for different individuals:

Staff or those working for or on behalf of EWNRA	Disciplinary action up to and including dismissal
<i>Volunteers</i>	Action up to and including termination of appointment
<i>Contractors/Consultants</i>	Termination of contract
<i>Visitors to EWNRA</i>	Appropriate action up to and including suspension of support for the visit

Any action taken will be in accordance with EWNRA’s policies and procedures and informed by national legislation. Depending on the nature and circumstances of the case, EWNRA will involve the appropriate authorities, including the Charity Commissioners, to ensure the protection of all programme participants and the transparency of our safeguarding processes.

8. Key Procedures to follow to ensure Child Safeguarding

- a) EWNRA will conduct Risk Assessments for all its programme/ projects involving children or those having a direct impact on children. All programmes/projects *from design until exit* will be monitored to ensure it meets the standards for safeguarding children.
- b) Representatives must never:
 - Act in ways that may be abusive or place Children at risk of abuse,
 - Hit, physically assault, or physically abuse Children *or* threaten to do so,
 - Engage in behaviors that are physically inappropriate or sexually provocative.,
 - Engage in sexual activity or have a sexual relationship with anyone under the age of 18 years irrespective of the age of majority/consent or local custom,
 - Stay alone overnight with one or more Children benefitting from EWNRA programs/projects who are not part of their family, whether in their house, project premises or elsewhere,
 - Have a Child who is engaged in programming or EWNRA activity, who is not a part of their family, stay overnight at their home,
 - Sleep in the same bed as a Child engaged in EWNRA programming/activity or sleep in the same room as the Child, who is not a part of the their family,
 - Exchange personal contact information or ask for Children’s personal information,
 - develop relationships with Children which could in any way be deemed exploitative or abusive,
 - Use language, make suggestions, or offer advice to Children which is inappropriate, offensive or abusive.
 - Do things for participating Children of a personal nature that they can do themselves (e.g., toileting, dressing, feeding, washing, etc.),
 - Condone or participate in behavior of Children which is unsafe or illegal,
 - Act in ways that shame; humiliate; belittle; or degrade Children, or otherwise perpetrate any form of emotional abuse,
 - Discriminate against, show unfair preferential or differential treatment towards certain Children engaged in Save programming/activity to the exclusion of others,

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- Ask to meet Children away from other adults or spend excessive time alone with Child engaged in EWNRA programming/activity away from others in a manner which could be interpreted as inappropriate; and/or
 - Expose Children to inappropriate images, films, music, and websites including mature content, indecent images (pornography) and violence.



Anti-Trafficking in Persons Policy

January 2023

1. Purpose

A person trafficking is a criminal act that violates fundamental human rights and the inviolable dignity and integrity of the human person. All EWNRA employees and anyone who represents the interests of EWNRA anywhere in the EWNRA intervention area in country must not traffic in persons or engage in any of the activities related to trafficking that are set forth in this policy as EWNRA Prohibit trafficking in human beings - children, women, and men. Disciplinary action up to and including dismissal will be taken against anyone found to be violating any aspect of this policy.

Consistent with its mission to alleviate poverty and possible influence by others emanating from their wellbeing like suffering and oppression, EWNRA is committed to a work environment and operations that are free from human trafficking and exploitation. Thus, this policy sets forth the expectations we have of our team members to avoid engagement of, complicity in, or benefiting from human trafficking.

2. Scope

This policy applies to:-

- a) all EWNRA staff
- b) anyone engaged by EWNRA such as consultants, contractors, volunteers, interns, or any person actively involved in a EWNRA programme/ projects
- c) visitors to EWNRA's programmes/projects

3. Prohibited Activities

Everyone included in this policy⁶ is prohibited from engaging in trafficking in children, women, and men.

- 1) are prohibited from engaging in trafficking in children, women, or men for sexual exploitation or procurement of any commercial sex acts (even if this practice is legal in a particular jurisdiction) including but not limited to forced prostitution, child prostitution, and paedophilic pornography.
- 2) shall not engage in trafficking in women and girls for purposes of forced or arranged marriages, or for any bride price schemes.
- 3) are prohibited from engaging in trafficking in children, women, and men for removal of organs for the illicit organ trade or for the illicit dealing, running, or trafficking of narcotics and drugs.
- 4) are prohibited from using force, fraud, or coercion to subject a child, woman, or man to forced labour, begging, or involuntary servitude.
- 5) shall not obtain labour from a child, woman, or man by threats of serious harm to that person or another person.
- 6) employment practices relating to trafficking in human beings, including:
 - Destroying, concealing, confiscating, or otherwise denying access to an employee's identity or immigration documents.
 - Using misleading or fraudulent practices to recruit employees, such as failing to disclose key terms and conditions of employment.
 - Using recruiters who do not comply with local labour laws.
 - Charging employees recruitment fees.
 - Failing to provide an employment contract or work document where required by law.
 - Knowingly obtaining goods or services that have been provided or produced by trafficked or forced labour.
 - Transparent recruitment practices that fully and accurately disclose, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits,

⁶ The staff of and anyone engaged by EWNRA, such as consultants, contractors, volunteers, interns, or any person actively involved in EWNRA's programmes/Projects

4. Procedures and training to Ensure Compliance

- All EWNRA staff will be informed about the contents of this policy about the Anti- Trafficking in Persons Policy and its trafficking related prohibitions, the reporting system, the actions that will be taken against the employee for violations, and the consequences for violating the policy.
- EWNRA Finance and Administrative Directorate must adhere to the highest standards in the recruitment of staff, and provide detailed information to employees regarding their rights and benefits.

5. Reporting mechanism, monitoring and investigations

The procedures for reporting, monitoring and investigating reported incidents are the same as those outlined in the EWNRA Code of Conduct. Any person within the scope of this policy is obliged to report actual or suspected breaches and to cooperate fully with any investigation into such.

The safety of persons reporting actual or perceived breaches is a very important consideration, and one that must not be taken lightly. The organization has an obligation to protect staff who come forward to report actual or perceived wrongdoing.

Issues reported to line management will be handled with the following safeguards:

- **Harassment or Victimization:** EWNRA recognizes that the decision to report a suspicion can be a difficult one to make, not least because of the fear of reprisal from those responsible for the potential malpractice. EWNRA, in accordance with its Human Resource Manual, will not tolerate any form of harassment or victimization, and will take all practical steps to protect those who raise an issue in good faith.
- **Confidentiality:** EWNRA will endeavor to protect an individual's identity when he or she raises an issue and does not want their name to be disclosed. It should be understood; however, that an investigation of any potential malpractice may need to identify the source of the information and a statement by the individual may be required as part of any evidence that is gathered in the investigation process.
- **Untrue Allegations:** Employees should be aware that if an allegation is made in good faith, but it is not confirmed by an investigation, EWNRA guarantees that no action will be taken against the complainant. If, however, individuals make malicious or vexatious allegations, disciplinary action up to and including dismissal will be considered against any individual making such an allegation.

As an organization, EWNRA will fully cooperate with the regulatory agencies to conduct audits and investigations on anti-trafficking compliance.

6. Actions arising from investigations

Persons who are judged guilty of breaches of this policy may have committed gross misconduct. Such breaches will result in disciplinary action, up to and including dismissal, being taken. In addition, where appropriate, EWNRA will refer significant breaches to the local law enforcement agencies with a view to initiating criminal prosecution.

7. Effective date

This policy has been approved and is in effect. It will be communicated to all:

- Staff, with a clear notice indicating that it has been incorporated into the EWNRA Code of Conduct and its' associated policies.
- It is binding on all staff.

8. Review of this policy

In the interests of maintaining good practice, the contents of this policy will be reviewed in conjunction with the review of the EWNRA Code of Conduct and its associated policy documents. Responsibility for initiating any such review rests with EWNRA top Management. Any changes to the policy that affect its underpinning principles or purpose will be submitted to the Board in for review and approval.



EWNRA Whistle Blowing Policy

June 2023

1. Introduction

Whistleblowing is making a disclosure in the public interest about possible wrongdoing in the workplace. Throughout this policy, the term “misconduct” is used to describe such wrongdoings. The categories of wrongdoing which may constitute misconduct include the following:

- criminal offences
- failure to comply with legal obligations
- miscarriage of justice
- endangering the health & safety of individuals
- damaging the environment
- attempting to cover up any of the above.

EWNRA is committed to the highest possible standards of openness, transparency and accountability in all its affairs. It will not always be clear that a particular situation falls within one of these categories and you are encouraged to report other types of misconduct such as, but not limited to, deliberate disregard or serious breach of EWNRA’s Code of Conduct, and concerns about fundraising practice.

Whistleblowing is generally NOT a complaint about a personal grievance (e.g. bullying, harassment etc.), and whistle-blowers therefore tend to be witnesses as opposed to complainants and rarely have a personal interest in the outcome of any investigation into their concerns.

2. Scope

EWNRA uses this policy to enable all EWNRA staff, volunteers, partners, consultants & contractors (engaged by EWNRA or any of its subcontractors and affiliates) to raise or disclose concerns at an early stage and in the right way. The organization will take appropriate measures to promote knowledge and awareness of the policy so that stakeholders are in a position to apply it as necessary.

3. Reporting Procedure

3.1 Standard Reporting Mechanism

As soon as you become aware of, or have good reason to believe that misconduct has occurred, is occurring or likely to occur, you should raise the matter with your line manager. For partners, consultants or contractors, you should raise the matter with your key point of contact within EWNRA. If you feel unable to raise the matter with your line manager/your keypoint of contact within EWNRA, you should raise it with a more senior manager.

The manager should consult with the responsible personnel in line with the relevant policy depending on the nature of the concern raised, as follows:

- For complaints about personal grievances such as bullying, harassment etc. (which are generally not considered to be whistleblowing), the HR manual should be referred to and the FA Director should be consulted.
- For incidents of fraud, theft or corruption, report to EWNRA management at head office.
- For issues relating to sexual exploitation and abuse concerns, EWNRA's Code of Conduct and associated policies should be referred to and report to EWNRA management at head office or project coordinators at field offices.
- For any other incidents of misconduct, seek guidance with the project management, FAD or in serious cases EWNRA management.

EWNRA is committed to treating all disclosures consistently and fairly. Accordingly, EWNRA will keep you informed of the progress of the investigation and its likely timescale. However, the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result.

3.2 Alternative Reporting Mechanism

If you have concerns that you feel cannot be raised through line management/your key point of contact within EWNRA or were not satisfied with the response you received, the following alternative contact channel is available to you:

For more information: ethio.wetland@gmail.com; +251 115 527791

3.3 Information/evidence to include

While it is important to provide as much information as possible to facilitate investigation of the issue, it is not necessary to have/provide hard evidence of misconduct before reporting a concern.

4. Safeguards for those making reports

4.1 Harassment or Victimization

EWNRA recognizes that the decision to report a suspicion can be a difficult one to make, not least because of the fear of reprisal from those responsible for the misconduct. EWNRA will not tolerate harassment or victimization and will take all practical steps to protect those who raise an issue in good faith.

4.2 Confidentiality

EWNRA will endeavour to take all reasonable steps to protect an individual's identity when he or she raises an issue and does not want their name to be disclosed. It should be understood, however, that an investigation of any misconduct may need to identify the source of the information and a statement by the individual may be required as part of the evidence.

4.3 Anonymous Reporting

EWNRA understands that you may wish to report your concerns anonymously and accepts that this

may occur from time to time. However, it should be noted that EWNRA does not encourage this as anonymous reporting can make it difficult to clarify the issues, substantiate claims, investigate concerns properly and provide feedback. Issues expressed anonymously will be considered at the discretion of EWNRA. In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the allegations and the supporting facts
- The likelihood of confirming the allegation from attributable sources

4.4 Untrue Allegations

If an allegation is made in good faith, but it is not confirmed by an investigation, EWNRA guarantees that no action will be taken against the complainant. If, however, individuals make malicious or vexatious allegations, disciplinary action will be considered against the individual making the allegation.

5. Prescribed Bodies

The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any misconduct in the workplace. That should ensure that the issue is addressed. However if you feel it is appropriate to whistle-blow to a prescribed/external body rather than internally, you should make sure that you have chosen the correct body for your issue. In Ethiopia, the Agency of Civil Society Organizations (ACSO) is responsible body when needed

6. Review of this Policy

In the interests of maintaining best practice, the contents of this Whistleblowing Policy will be formally reviewed by the Management and approved by Board of EWNRA in Addis Ababa every five years. In the interim, management is authorized to make adjustments as may be required by changes to statutory obligations and/or donor requirements - however any other significant revision will need approval by the Board of EWNRA.