



WECF Code of Conduct

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INTRODUCTION

Women Engage for a Common Future (WECF) is a not-for-profit, independent non-governmental organisation, not affiliated to any political party or religious institution, aiming at promoting the full participation of women in sustainable development and environmental policy making.

WECF implements sustainable development projects and facilitates the cooperation among women's and environmental organisations around the world. The WECF network focuses on the issues of environment, health and sustainable development in relation to gender justice, social justice, poverty eradication and human rights. Our approach is to jointly implement practical projects and policy-influencing activities with partners in Europe and worldwide, always from a gender perspective. We have recognised that our strength is based on working from the local level to national and international levels. Our mission is to work for a healthy environment for all. Our overall goal is to achieve an equitable and sustainable future for all.

To fulfil this mission WECF expects its staff¹, board², partners³, consultants and other alliances to act in accordance with the principles set out in this Code of Conduct, which reflects WECF's beliefs.

This code of conduct is shared with all staff and annexed to all employment contracts and to the Memorandum of Understanding (MoU) and / or contracts, which all partners sign when joining the network and / or engaging in joint activities. Furthermore, it will be the basis for all cooperation with natural or legal persons, in particular civil society organisations, donors, public authorities, governmental and inter-governmental entities and business.

This code of conduct consists of five parts: 1) Guiding Principles, 2) Inappropriate Behaviour, 3) Notification Procedures, 4) Proportionate Sanctions and 5) Reporting & Organisational Culture.

PART 1 GUIDING PRINCIPLES

Respect for Universal Principles

We seek to advance international and national laws and other normative frameworks that follow a human rights-based approach⁴, promoting sustainable development, environmental protection, gender equality, poverty eradication, public participation and social justice. In doing so, we respect the equal rights and dignity of all human beings.

Respect for All and Treating People Fairly

¹ "Staff" is defined as employees, contractors on a free-lance basis, and volunteers.

² "Board" is defined as members of the WECF network's Board of Trustees and the International Advisory Board.

³ "Partner" is defined as any natural or legal person with whom WECF jointly works

⁴ "A human rights-based approach is a conceptual framework for the process of human development that is normatively based on international human rights standards and operationally directed to promoting and protecting human rights." (see United Nations Office of the High Commissioner for Human Rights 2006: "A human rights-based approach to development cooperation"). Under a human rights-based approach, the plans, policies and processes of development are anchored in a system of rights and corresponding obligations established by international law, in particular international human rights law. This comprises the UN Declaration of Human Rights, the core human rights treaties negotiated under the auspices of the United Nations, in particular CEDAW and secondary law, in particular resolutions by the main organs of the United Nations, the Human Rights Council, and the UN human rights treaty bodies.

We do not discriminate on grounds of race, gender, age, social class, disability, beliefs or sexual orientation. We stimulate diversity amongst our staff, members and partners. We believe in putting people first. We put the principle of fairness at the core of our organisation by having a fair wage structure with a credible scale between highest and lowest paid worker.

Respect for Our Environment and Future Generations

We promote the protection of our and our children's health, with a focus on a precautionary approach to environmental health. We actively promote the protection of our environment, including a nuclear free environment, fostering safe and sustainable management of energy, water and waste(-water), elimination of hazardous chemicals and technologies, including agriculture free of hazardous pesticides and GMOs (genetically modified organisms). We support a transformation of our current unsustainable economy towards socially-just economies operating within the carrying capacity of the planet, and which avoid unsustainable consumption and production practices, and respect the rights and needs of indigenous peoples and rural communities.

Making Choices in Accordance with Our Beliefs

We do not accept economic reasons for compromising on our children's health, our own health and the environment. We do not participate in actions that are not compatible with our principles and objectives. We do not seek funding from donors, including businesses, that are not in line with WECF's objectives and principles.

Being Transparent and Accountable

We commit to transparent relationships with partners and other civil society organisations, freely and as equals. We are accountable to donors, partners and members. Annual reports (narrative and financial) will be published and regularly audited. We respect the rights of our donors: to be informed about causes for which we are fundraising and to be informed about how their donation is being used. We make any source of funding public and ensure that donations are free from direct or indirect obligations and/or influence on the policies and strategies of WECF and its partner organisations. We acknowledge funding sources in publications, event materials and on our website.

Governance, Participation and Learning

We have open democratic, participatory, consultative problem-solving and non-discriminatory practices. We monitor and evaluate our activities and results, based in part on locally formulated indicators relating to process and outcome. We have a Board of Trustees, which bears the final responsibility for our strategic and financial management. We give a voice to our partners through our International Advisory Board, whose recommendations are leading in setting our strategic priorities for our work programmes. We are striving for dialogue by involving multi-stakeholders in our activities. We share information with all partners and invest in the necessary mechanisms to gather and exchange experiences. We encourage an interrelated transfer of knowledge and capacities between West and East and South and North. We promote professionalism and competence.

Respect for international standards

We refrain from making available directly or indirectly funds or economic resources to any natural or legal person, entity or body placed on the UN sanctions list, as well as from other activities which would violate UN sanctions. This obligation is without prejudice to exceptions to UN sanctions and possibilities to apply for exemptions from UN sanctions. Moreover, we will refrain from supporting

activities whose aim is to undermine the political autonomy of a state or to bring down a lawful government by unlawful means. Whether the one or the other is lawful or unlawful will be determined not only by the views of the government of the country in question, but also in accordance with international standards, including international law.

PART 2 INAPPROPRIATE BEHAVIOUR

Misuse of power or position

WECF has no tolerance for **corrupt practices**. WECF's [Anti-Fraud and Anti-Corruption Policy](#) (Annex 1), defines corruption as “the act of dishonestly obtaining an advantage from a third party by abusing an entrusted power for private gain. Neither fraud nor corruption are restricted to monetary or material benefits but could also include intangible benefits such as status or access to information.”

As a precondition a clear understanding of what practices are considered corrupt, fraudulent and otherwise unacceptable is communicated to all staff and partners in advance. The information is part of the contracts and memorandums of understanding which they sign to ensure no misconceptions persist (see part 5).

No employee shall, while in the employment of WECF, engage in any business or activity that would undermine their performance or **conflict with the interests** of the organisation. The same applies to partners with which WECF has an on-going contract of cooperation. WECF, or its partners, shall as a rule not enter into agreements with or procure goods or services from employees, directors or their relatives. No employee, director or member of the Board of Trustees may be involved in any decision-making process, or seek in any way to influence it, where they may be in a position to gain privately from the decision or their relatives are involved. All employees shall disclose any potential conflict of interest and seek approval before proceeding.

The employee or partner is required to keep **confidentiality** as regards their knowledge arising from the function in relation to matters which should be known or reasonably should be understood to be confidential in nature or can damage the reputation of WECF.

Financial violations

WECF has a zero-tolerance policy to **fraud** and requires staff and volunteers at all times to act honestly and with integrity and to **safeguard the assets for which they are responsible**. WECF's [Anti-Fraud and Anti-Corruption Policy](#) (Annex 1) defines fraud as “a whole range of activities such as deception, bribery, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. It involves the act of deceit of the organization in order to obtain a personal or collective advantage, avoid an obligation or cause loss.”

In addition, WECF has an [Ethical Charter for Cooperation with Partners from the Private Sector](#) (Annex 2) which defines that WECF only cooperates with socially responsible business partners that are working **in line with our organizational purpose and objectives**, excluding partners involved in unsustainable and harmful practices, including tax evasion.

Interpersonal violations

WECF has a zero-tolerance policy for **any form of sexual harassment** in the workplace. WECF's [Policy to Prevent and Address Sexual Harassment and Abuse](#) (Annex 3) defines sexual harassment as “an unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or

intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient."

Every employee shall conduct themselves with courtesy, respect and integrity towards all persons while performing their work. The same applies to partners with which WECF has an on-going contract of cooperation and / or Memorandum of Understanding.

Aggression, discrimination, bullying and violence are not tolerated. WECF staff and partners must avoid any actions or behaviour involving children that may constitute poor practice or potentially abusive behaviour.

PART 3 NOTIFICATION PROCEDURES

Any person who witnesses a violation of this Code of Conduct is invited to report this violation, and any person to whom the Code of Conduct applies who witnesses a violation of it is required to report the violation at the earliest possible moment.

Violations can be reported to the responsible manager or the integrity officer of WECF. Suspicions involving a member of the Board of Directors can be brought to the integrity advisor in the Board of Trustees. Also, when a person does not feel comfortable to report to the responsible manager or integrity officer of WECF, a report can be filed to the integrity advisor in the Board of Trustees.

If the reporting person does not want to use the aforementioned notification procedures, the final option is to contact the external whistle-blower point. Please read [WECF's Whistle-blower Policy](#) (Annex 4) before doing so.

In case the reporter would like to get independent advice and support while protecting their identity, they can contact the external person of trust.

Contacts of WECF's integrity officer, the integrity advisor in the Board of Trustees, the external whistle-blower point as well as the external person of trust can be found on the website of WECF.

Following [WECF's Stakeholder Satisfaction and Complaints Procedure](#) (Annex 5), staff of implementing partners, beneficiaries and service providers are encouraged to report violations or suspected violations of the Code of Conduct initially to their regular contact person at WECF or the Executive Director. Complaints about the Executive Director are dealt with and acted upon by the Board of Trustees.

Anyone who reports a breach of this Code of Conduct should receive an initial answer that confirms reception of the report within a week. Within a month, a procedure to deal with the report should be set in motion. In case this timeline is not kept, the reporting person should notify the Board of Trustees of WECF.

More specific procedures for different types of violations of this Code of Conduct are defined in the Anti-Fraud and Anti-Corruption Policy and the Policy to Prevent and Address Sexual Harassment and Abuse (Annexed).

WECF attaches great importance to an open and transparent culture that supports the reporting person and makes them feel that complaints are taken seriously. WECF will never allow the reporting person to be victimized or dismissed because of filing a report. On indication of the reporting person, breaches of this Code of Conduct are handled with discretion and the utmost confidentiality.

PART 4 PROPORTIONATE SANCTIONS

Proportionality of sanctions is a core principle of justice. WECF has a range of sanctions it considers fair and that will be applied proportional to the offences.

To staff that has been found to violate this Code of Conduct, sanctions proportionate to the scope and seriousness of the offence will be applied. Sanctions include, but are not limited to:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- suspension
- dismissal
- reporting to public authorities

The nature of the sanctions will depend on the gravity and extent of the violation. Suitable deterrent sanctions will be applied to ensure that incidents are not treated as trivial. This may include immediate dismissal.

Staff of partners that violate the Code of Conduct or act in breach of their contract with WECF are subject of WECF's [Sanction Policy](#) (Annex 6). Possible sanctions include:

- Warning to partners
- Deduct losses from project funds
- No payment or later payment of further instalments
- Early termination of the contract
- Full or partial repayment of contract funding
- Early termination of the contract
- Declaration to public authorities or legal steps to claim refund of money

WECF may choose or in some cases will be obliged to report to the relevant professional or government authorities in case the law has been or suspected to have been broken.

Final decision-making responsibility regarding sanctions lies with the Executive Director, or, in case it concerns the Executive Director, the Board of Trustees.

PART 5 REPORTING AND ORGANISATIONAL CULTURE

WECF ensures that our Code of Conduct and related integrity policies are part of the culture of the organisation. All staff and those acting on behalf of the organization are aware of our Code of Conduct, including the notification procedures and are alert to their proper application. The Code of Conduct is part of every employment contract, and the memoranda of understanding and contracts with partners. Each year, at our annual strategic meeting, attention is paid to integrity, further training needs are assessed and eventual cases that occurred during the year are discussed.

Reports and integrity risks are, depending on the nature and level of confidentiality, discussed at least annually with the Board of Directors and the Board of Trustees, and when deemed necessary more often. Staff is encouraged to put moral dilemmas on the table at any time. The controller, who is our Integrity Officer, is responsible for making sure integrity is on the agenda and proper actions are implemented in the organisation.

To make sure all notifications are registered, the Integrity Officer is responsible for registering all notifications in the Incident Register, which is discussed at least annually with the Board of Trustees and Board of Directors, and annually at our strategic meeting with staff. WECF aims to learn and improve its policies and procedures and will evaluate after each report if our integrity policies need to be updated.

WECF attaches great importance to transparency and reports on integrity in its Annual Accounts and Annual Activity Report. This includes information about the number and nature of reports about integrity violations and the action taken in response to those reports as well as a reflection on WECF's integrity policy.

ANNEX 1

WECF's Anti-Fraud and Anti-Corruption Policy



WECF has a zero-tolerance policy and attitude towards fraud and corruption and always requires staff and volunteers to act honestly and with integrity and to safeguard the assets for which they are responsible. The anti-fraud, and anti-corruption policy applies to all staff, board and partners. The principles and definitions in this policy also extend to relationships WECF has with partners.

Definitions

The term **fraud** is used to describe a whole range of activities, including deception, bribery, forgery, extortion, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. It involves the act of deceit of the organization in order to obtain a personal or collective advantage, avoid an obligation or cause loss. **Corruption** involves the act of dishonestly obtaining an advantage from a third party by abusing an entrusted power for private gain. Neither fraud nor corruption are restricted to monetary or material benefit but could also include intangible benefits such as status or access to information. WECF's understanding of corruption explicitly comprises sexual corruption, i.e. Situations in which sexual favours are extorted in return for assistance or preferential treatment. WECF acknowledges that sexual corruption is a huge problem in many areas of the world.

Related Policies and Procedures

The anti-fraud and anti-corruption policy of WECF should be read in conjunction with the Code of Conduct, the WECF Sanction Policy, the Ethical Charter for Cooperation with Business, and the Policy to Prevent and Address Sexual Harassment and Abuse.

WECF takes any attempt to commit an act of corruption or fraud by members of staff, volunteers, partners, their employees and agents acting on behalf of WECF to constitute a most serious offense. Employees and volunteers involved in corruption of any kind will be subjected to disciplinary action within the organization and may be reported to external authorities for criminal prosecution, if appropriate. WECF treats an attempted act of corruption as seriously as an accomplished act.

Responsibilities

WECF is committed to preventing fraud and corruption from occurring and developing an anti-fraud and anti-corruption culture. To achieve this WECF will:

- Develop and maintain effective controls to corruption
- Ensure that if corruption occurs, a vigorous and prompt investigation takes place
- Take appropriate disciplinary and legal action in all cases, where justified and
- Review systems and procedures to prevent similar situations

Staff Responsibilities

In the view of WECF, all staff, partners, volunteers and others involved in WECF activities have a role to play to prevent and/or report corruption. Their responsibilities include:

- Acting with propriety in the use WECF's assets resources
- Conducting themselves in accordance with the principles set out in the Code of Conduct

- Alerting the responsible manager where they believe the opportunity for corruption exists
- Reporting details immediately of:

(a) any suspected cases of corruption

(b) any suspicious acts or events which might give rise to a suspicion of fraud or corruption

(c) assist in any investigations by making available all relevant information and by cooperating in interviews.

Responsibilities of the Executive Director

- Ensuring that the risk of fraud has been properly identified and assessed by management.
- Internal control has been properly designed to address the risk of fraud and that they
- are working effectively.
- Reporting serious cases of fraud and corruption to the Board of Trustees.
- At the request of Board of Trustees, carrying out investigations of suspected or alleged fraud and corruption where there is a significant risk to WECF's reputation.

Responsibilities of the Financial Controller

- Establishing the internal control system designed to counter the risk of fraud and corruption and ensuring the adequacy and effectiveness of this system.
- Ensuring that there are arrangements in place for investigation of all suspected and alleged fraud or corruption.
- Ensuring that a Risk Register and Incident Register are in place.
- Ensure that all (presentations of any) financial statements are in accordance with the required reporting standards, include all relevant financial transactions and data, but exclude any financial misstatements.
- Secure and screen the identity of WECF's related parties and determine them being non-fraudulent and non-corrupt and checking their solvency.
- Reporting all cases of fraud and corruption to the Board of Directors and Financial Audit and Risk Committee.

Responsibilities of Project Officers and Programme Coordinators

- Identify the risks of the proposed projects based upon the proposal written, previous experiences with the partners and the reputation of the partner. Keep track of identified risks and mitigation measures in the Risk Register.
- Ensure there are clear written contracts for all projects based upon the agreed WECF templates including a budget. The program coordinators also have the task to monitor and evaluate the programmes to ensure that activities are in line with spending and inappropriate developments can be identified.

Notification procedures

Any person who witnesses any form of fraud or corruption is invited to report this violation. Any person to whom the Code of Conduct applies who witnesses fraud or corruption is required to report this at the earliest possible moment.

Cases of fraud and corruption can be reported to the responsible manager or the integrity officer of WECF. Suspicions involving a member of the Board of Directors can be brought to the integrity advisor in the Board of Trustees. Also, when a person does not feel comfortable to report to the

responsible manager or integrity officer of WECF, a report can be filed to the integrity advisor in the Board of Trustees.

If the reporting person does not want to use the aforementioned notification procedures, the final option is to contact the external whistle-blower point. Please read [WECF's Whistleblower Policy](#) before doing so.

In case the reporter would like to get independent advice and support while protecting their identity, they can contact the external person of trust.

Contacts of WECF's integrity officer, the integrity advisor in the Board of Trustees, the external whistle-blower point as well as the external person of trust can be found on the website of WECF.

WECF considers it important to protect the identity of the persons making corruption disclosures and will try to ensure that information relating to the identity of the person making the disclosures is not released. If there is a need to release such information this will first be discussed with the person concerned.

Proportionate sanctions

It is the policy of WECF to always undertake action if a staff member is, or has been involved, in corruption or fraud. Action depends upon the seriousness of the identified corruption case and the function of the employee concerned. Normally any involvement in corruption should lead to at least one of the following reactions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- suspension
- dismissal
- reporting to public authorities

WECF aims to ensure that fraud and corruption does not occur in projects with partners. WECF informs all partners of its fraud and corruption policy with a reference in the contract and / or Memorandum of Understanding, and a reference to penalty measures foreseen (see Sanction Policy).

Final responsibility of decision-making regarding sanctions lies with the Executive Director, or in case it concerns the Executive Director, the Board of Trustees.

WECF's Ethical Charter for Cooperation with Partners from Private Sector



WECF expects its staff, volunteers, partners, consultants and other alliances to act in accordance with the principles set out in the Code of Conduct. In addition to the WECF Code of Conduct, the Ethical Charter deals specifically with partnerships with private sector and scientific organisations and serves as an addendum to the Code of Conduct.

1. Our vision for Cooperation with Business

WECF encourages cooperation with socially responsible business partners, businesses which are working on a transformation for environmentally sustainable products and services, produced and delivered in full respect of human rights, workers' rights and women's rights in accordance with relevant international norms and standards, and transparent monitoring and reporting on the impact of their products on women, indigenous peoples, local communities and the environment, throughout the lifecycle. We look for cooperation with business partners which apply the precautionary principle, take full responsibility for any damage or pollution, do not evade taxes, and report transparently on their social, gender and environmental policies and impact, through a.o. annual reports, fair-trade labels and eco-labels.

2. Possible Forms of Cooperation with Business

- Voluntary and pro bono work: employees offering their specific competence/knowledge/experience to WECF.
- Targeted sponsorship: financing WECF's publications, websites, events in return for publicity of respective financial sponsor (e.g. via showing the logo on WECF's website).
- Strategic partnership: transfer of knowledge, sharing of strategic thinking, corporate responsibility policies.
- Joint working on campaigns and projects, forming coalitions.
- Financial support: financing projects, organising common events.
- In kind support: donation of products, materials.

3. Our Requirements towards Cooperation Partners in Business

- We expect from every cooperation partner to respect our principles enshrined in the Code of Conduct, as mentioned under "making choices in accordance with our beliefs". This excludes any partner involved in unsustainable and harmful activities and technologies such as among other GMOs, synthetic pesticides, mining, nuclear and fossil energy.
- WECF does not take funding from donors that obviously do not respect human rights, women's rights.

- WECF will use available tools/reports assessing the social and environmental responsibility as well as the lobbying practices of respective cooperation partners.
- The cooperation partner should be committed to a sincere and integrated strategy for sustainable development (e.g. regarding the ecological footprint, health impact and socio-economic impact of the business) concerning its production and/or sales strategy.
- The cooperation partner should accept to share information and exchange ideas with WECF on its product composition, production processes, especially concerning their environmental and health impacts.

WECF's Policy to Prevent and Address Sexual Harassment and Abuse



1. Policy Statement

As a feminist organisation WECF International is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment, and to work with staff and network partners towards a world free of sexual and gender based violence (SGBV).

#MeToo showed that sexual violence is a structural issue and is very much alive due to the power dynamics shaped by society's constructed gender roles, valuing men over women and non-binary persons. But it also showed that this is not tolerated anymore, that we need a paradigm shift.

WECF International has a zero-tolerance policy for any form of sexual harassment in the workplace, treats all incidents seriously and promptly investigates all allegations of sexual abuse and harassment. Any person found to have sexually harassed another person will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. We will not tolerate any negative treatment in the workplace of persons making such a complaint. We will always take measures to protect the aggrieved person, and in all steps of investigation of the alleged perpetrator ensure the consent of the aggrieved and reporting person. This includes external and formal reporting on extreme and criminal conducts such as rape and violence. We stand side by side with the reporting person and give guidance to relevant institutions whenever needed.

WECF International endeavours to engage, inform and build the capacity of staff and network partners to understand the underlying structural causes and power-dynamics of all forms of discrimination, sexual and gender based violence (SGBV), and to promote the responsibility of all staff and partners to work towards elimination of sexual harassment, abuse and exploitation in our organizations, communities and societies.

2. Definition of sexual harassment and consent

Sexual harassment is an unwelcome conduct of sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient, such as for example sexually charged jokes.

It is very common that persons who have been subjected to unwelcome conduct do not react immediately upon it. Sometimes it can take up to years to fully cope with what you have experienced. In other cases, it can be difficult for the person to report the perpetrator, particularly if the perpetrator is in a position of power (manager, boss), or because there is lack of trust in the legal and police system. That means that sometimes there can be a time delay between the unwelcome conduct and the reporting. There is no "right way" to react to having experienced sexual harassment

or rape, people react differently due to the trauma involved. Anyone making an official complaint should therefore be met with utmost respect and should always be presumed as telling the truth. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and nonverbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault and rape
- The use of job-related threats or rewards to solicit sexual favours, such as threatening to have someone fired if they tell anyone about the sexual harassment etc.

Verbal conduct

- Comments on a worker's appearance, age, private life, etc. For example, to comment on someone's appearance when they are in the middle of a presentation.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the assumed gender of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email) without the consent of the receiver

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

Sexual consent means "unless it's a yes, it's a no!" Any sexual conduct that does not have explicit consent from the persons participating is rape. You can withdraw your consent at any time during the sexual intercourse.

WECF international recognizes that a perpetrator can be anyone, regardless of their gender, and the sexual harassment and/or violence can be targeted towards any gender. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

WECF International recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of WECF International, partners, contractors or visitors who sexually harasses another during work will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within WECF International premises or outside, including at social events, trips, training sessions or conferences sponsored and/or hosted by WECF International.

3. Complaints procedures

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. WECF International recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the aggrieved person to inform the alleged harasser.

Any person who witnesses any form of sexual harassment or abuse is invited to report this violation. Any person to whom the Code of Conduct applies who witnesses any form of sexual harassment or abuse is required to report this at the earliest possible moment.

Cases of sexual harassment and abuse can be reported to the responsible manager or the integrity officer of WECF. Suspicions involving a member of the Board of Directors can be brought to the integrity advisor in the Board of Trustees. Also, when a person does not feel comfortable to report to the responsible manager or integrity officer of WECF, a report can be filed to the integrity advisor in the Board of Trustees.

If the reporting person does not want to use the notification procedures, the final option is to contact the external whistle-blower point. Please read [WECF's Whistle-blower Policy](#) before doing so.

In case the reporter would like to get independent advice and support while protecting their identity, they can contact the external person of trust.

Contacts of WECF's integrity officer, the integrity advisor in the Board of Trustees, the external whistle-blower point as well as the external person of trust can be found on the website of WECF.

The integrity officer, integrity adviser and person of trust should be trained on understanding and deciding what constitutes sexual harassment, how to investigate it and follow up on outcomes of the process, in order to make sure that the wishes and needs of the aggrieved person are incorporated into the outcome of the complaints mechanism.

When a designated person receives a complaint of sexual harassment, they will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the reporting person to what outcome they want
- ensure that the reporting person understands the organisation's procedures for dealing with the complaint
- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the reporting person from pursuing a formal complaint if they are not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the reporting person
- ensure that the reporting person knows that they can lodge the complaint outside of the organisation through the relevant country/legal framework
- treat the reporting person with utter most respect throughout the procedure, WECF will never doubt the credibility of the person reporting the sexual harassment, it is the responsibility of the alleged perpetrator to prove s/he's innocence.

WECF International recognises that because sexual harassment often occurs in unequal relationships within the workplace, many often feel that they cannot come forward and report sexual harassment and violence. WECF International understands the need to support these persons in making complaints.

Informal complaints mechanism

If the person wishes to deal with the matter informally, the designated WECF person will:

- give an opportunity to the alleged harasser to respond to the complaint
- ensure that the alleged harasser understands the complaints mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator to resolve the matter
- ensure that a confidential record is kept of what happens
- follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped
- ensure that the above is done speedily and within 7 days of the complaint being made

Formal complaints mechanism

If the reporting person wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome, the formal complaint mechanism should be used to resolve the matter. The designated person who initially received the complaint will refer the matter to an external investigator.

The person carrying out the investigation will:

- interview the reporting person and the alleged harasser separately
- interview other relevant third parties separately
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, consult the reporting person and decide what the appropriate remedy for them is (i.e.- an apology, a change to working arrangements, a promotion if they were demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped, and that the reporting person is satisfied with the outcome
- if it cannot determine that the harassment took place, the reporting person may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within 14 days of the complaint being made

Outside complaints mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the WECF offices and related partner offices. They can do so through the following mechanisms depending on the respective country's legal framework.

We strongly encourage the reporting person to take legal steps against alleged perpetrators and will stand side by side the reporting person to give support. WECF International puts consent of the reporting person first and will never contact official authorities without the consent.

4. Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- suspension
- dismissal
- reporting to public authorities

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

5. Implementation of this policy

WECF International will ensure that this policy is fully understood and will organize trainings for employees as well as network partners once a year.

All new employees, interns and volunteers must be actively informed on the content of this policy as part of their induction into the organization. Reference is made to this policy in all employment contracts.

Contracts and Memoranda of Understanding with partners will include the requirement for partners to adhere to the zero tolerance of the Policy to Prevent and Address Sexual Harassment and Abuse of WECF International, and to ensure necessary procedures in their own organizations.

For outreach and awareness raising, WECF International can organize capacity building to support network partners including those where there is no legal/ contractual relationship.

Monitoring and evaluation

WECF International recognizes the importance of monitoring this sexual harassment policy. Whenever a case of sexual harassment occurs the designated person for dealing with sexual harassment will report to the Board of Trustees to ensure compliance. As a result of this report, the organization will evaluate the effectiveness of this policy and make any changes needed.

Partners

WECF International encourages its international partners to adopt similar policies on sexual harassment. As a feminist women's organization working towards a gender just and healthy environment, we feel the responsibility to share our experience to prevent sexual harassment and reveal underlying power structures that are the breeding ground for misconduct and abuse. Within our international projects we share best practices and demand from our local partners to have sexual harassment policies in place.

WECF's Whistleblowing Policy



WECF seeks to attain the highest possible levels of integrity, accountability. The organisation has adopted a zero-tolerance policy towards any form of inappropriate behaviour. This is why WECF has adopted a range of proactive measures to prevent and deter acts of inappropriate behaviour among its staff, implementing partners, beneficiaries and service providers.

All staff are required to observe the highest standards of organisational and personal ethics when performing their duties and responsibilities. They are expected to be honest and maintain integrity in fulfilling their responsibilities and comply in full with all applicable laws and regulations, as well as the Code of Conduct of WECF.

This whistleblowing procedure is an important element for detecting corrupt, illegal practices and inappropriate behaviour and is consequently considered an essential component for achieving good governance.

1. Definition whistleblowing

Under this procedure, 'whistleblowing' is defined as WECF employees and the staff of partners, beneficiaries and service providers reporting suspected misconduct, illegal acts or failures to act in respect of WECF-related matter. The aim of this procedure is to encourage employees and others who have serious concerns about any aspect of WECF's work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within the organisation. Whistleblowing is viewed by WECF as a positive act that can make a valuable contribution to WECF's efficiency and long-term success. WECF is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in everything the organisation does. To help achieve these standards it encourages freedom of speech.

Persons who are considering raising any concerns are encouraged to read this procedure first. It explains: the type of issues that can be raised, how the person raising a concern will be protected from victimisation and harassment, how to raise a concern, and what WECF will do to follow up on a complaint.

Persons who are unsure whether to use this procedure or that want independent advice at any stage are advised to contact external person of trust of any of the offices of WECF for support. Contacts can be found on the website.

2. Aim and application of the whistleblowing procedure

2.1 Aims of the procedure

The procedure is designed to ensure that anyone can raise concerns about wrongdoing or malpractice within WECF without fear of victimisation, subsequent discrimination, disadvantageous treatment or dismissal.

It is also intended to encourage and enable anyone to raise serious concerns within WECF rather than ignoring a problem or 'blowing the whistle' concerning such issues to other parties.

This procedure aims to: Encourage anyone to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practices, provide safe channels to raise those concerns and receive feedback on any action taken, ensure that the reporting person receives a response to their concerns and that they are aware of how to pursue them if they are not satisfied, reassure them that they will be protected from possible reprisals or victimisation if they have made any disclosures in good faith.

2.2 Scope of this procedure

This procedure is intended to enable those who become aware of any wrongdoing at WECF that impacts on another person or service, to report their concerns at the earliest opportunity so that they can be properly investigated. If a beneficiary or partner has a concern about a project or services provided to them, it should be submitted as a complaint to WECF, following the WECF Stakeholder and Complaints Procedure.

2.3 Who can raise concerns under this procedure?

Any person who witnesses a violation of the Code of Conduct is invited to report this violation. Any person to whom the Code of Conduct applies who witnesses a violation of it is required to report the violation at the earliest possible moment.

2.4 What should be reported?

Any serious concerns that a person has about service provision or the conduct of officers of WECF or others acting on behalf of WECF that: makes a person feel uncomfortable in terms of established standards; fall below established standards of practice; or are improper behaviour. These might relate to: conduct which is an offence or a breach of the law (a criminal offence has been committed or a party fails to comply with any other legal obligation), disclosures related to miscarriages of justice - racial, sexual, disability or any other form of discrimination, health and safety of the public and/or other employees, environmental degradation, unauthorised use of public funds or other assets, possible fraud and corruption, neglect or abuse of beneficiaries, or other unethical conduct. This list is not exhaustive.

3. Protecting the whistle-blower

3.1. Support for the whistle-blower

WECF is committed to good practices and high standards and to being supportive of reporting persons in any other manner. WECF recognises that the decision to report a concern can be a difficult one to make and will not tolerate any harassment or victimisation of a whistle-blower (including informal pressure) and will take appropriate action to protect the reporting person to come forward.

Throughout the process the whistle-blower will be given full support from the Board of Directors. Concerns will be taken seriously, and WECF will do all it can to assist the whistle-blower throughout the investigation. WECF will endeavour to provide appropriate advice and support wherever possible.

3.2 Confidentiality

All concerns will be dealt with confidentially and every effort will be made to not reveal the identity of the whistle-blower, should the whistle-blower wish it to remain confidential. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of the disclosure without the whistle-blower's assistance. In that case the whistle-blower may be asked to

come forward as a witness. If the whistle-blower agrees to this, they will be offered advice and support.

3.3 Anonymous allegations

This procedure encourages the whistle-blower to identify if possible. This enables WECF to protect the whistle-blower and to give feedback. In exercising this discretion, the factors to be considered include: the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from other sources. For anonymous reporting WECF makes use of an external whistleblowing point. Contact details can be found on the website.

3.4 False allegations

If a whistle-blower makes an allegation in good faith and reasonably believes it to be true, but it is not confirmed by the investigation, WECF will recognise the concern and there will be no further consequences. If, however, the whistle-blower makes an allegation frivolously, maliciously or for personal gain, appropriate action, including disciplinary action, may be taken.

4. Raising a concern

4.1 Notification procedures

Cases can be reported to the responsible manager or the integrity officer of WECF. Suspicions involving a member of the Board of Directors can be brought to the integrity advisor in the Board of Trustees. Also, when a person does not feel comfortable to report to the responsible manager or integrity officer of WECF, a report can be filed to the integrity advisor in the Board of Trustees.

If the reporting person does not want to use the aforementioned notification procedures, the final option is to contact the external whistle-blower point.

In case the reporter would like to get independent advice and support while protecting their identity, they can contact the external person of trust.

Contacts of WECF's integrity officer, the integrity advisor in the Board of Trustees, the external whistle-blower point as well as the external person of trust can be found on the website of WECF.

4.2 How to raise a concern

A concern can be raised by telephone, in person or in writing. The earlier a concern is raised, the easier it is to act. The whistle-blower needs to provide the following information: the nature of the concern and it is believed to be true, the background and history of the concern (giving relevant dates).

Although the whistle-blower is not expected to prove beyond doubt that the suspicion is true, the whistle-blower will need to demonstrate that there is a genuine concern relating to suspected wrongdoing or malpractice within WECF and that there are reasonable grounds for the concern.

The whistle-blower may wish to consider discussing the concern with a colleague first. Whistle-blowers may find it easier to raise the matter if there are two or more employees who have had the same experience or concerns.

Whistle-blowers may invite your trade union, professional association representative or a friend to be present for support during any meetings or interviews in connection with the concerns that have been raised.

5. What WECF will do

WECF will respond to the concerns as quickly as possible. Investigation of the concerns is not the same as either accepting or rejecting them. The overriding principle for WECF will be that of the public interest. In order to be fair to all employees, including those who may be wrongly or erroneously accused, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until it becomes necessary to do so or if such becomes necessary. In certain cases, however, such as allegations of ill-treatment of others, immediate suspension from work may have to be considered. Protection of others is paramount in all cases.

Where appropriate, the matters raised may be investigated by the directors or controller of WECF, be referred to the police, be referred to the external auditor, be referred to and subjected to established child protection/abuse procedures, form the subject of an independent inquiry.

Within a week of a concern being raised, the person investigating your concern will write to you acknowledging that the concern has been received, indicating how WECF proposes to deal with the matter,

The level of contact between the whistle-blower and the person considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information. It is likely that the whistle-blower will be interviewed to ensure that the disclosure is fully understood. Any meeting can be arranged away from the workplace, if desired, and a union or professional association representative or a friend may accompany the whistle-blower to provide support.

WECF will do what it can to minimise any difficulties that a whistle-blower may experience as a result of raising a concern.

It is the task of WECF to assure that your disclosure are properly addressed. Unless there are any legal reasons why this cannot be done, the whistle-blower will be kept informed of the progress and outcome of any investigation.

7 Who is responsible?

The Executive Director has overall responsibility for the maintenance and execution of this procedure. The Integrity Officer of the staff carries the main responsibility for implementation of this policy. In case the complaint concerns the Executive Director, the Integrity Advisor of the Board of Trustees takes over responsibility.

8 Learning and external advice

This procedure is intended to guarantee proper dealing with concerns that are raised by anyone. All reports will be included in the Incident Register, which is discussed at least annually with the Board of Trustees, and annually at strategic meetings with staff and monthly at meetings of the Board of Directors. WECF aims to learn and improve its policies and procedures and will evaluate after each report if this whistle-blower policy needs to be updated.

WECF hopes whistle-blowers will be satisfied with any action taken. If this is not the case, whistle-blowers are recommended to take the matter to parties outside of WECF. This procedure does not prevent anyone from seeking legal advice.



WECF's Stakeholder Satisfaction and Complaints Procedure

1. This stakeholder satisfaction policy is based on the 'code of governance' for charity organisations in The Netherlands ('CBF code for good governance, 2015). This code states that "the organisation has a procedure that enables stakeholders to share their ideas, remarks, wishes and complaints and to get in dialogue with the organisation if the stakeholder is of the opinion that he/she is not heard sufficiently. The organisation ensures that stakeholders are aware of, and have access to, this procedure."
2. The purpose of the policy is to ensure satisfaction among those that are involved or affected in one way or the other by WECF's actions. The policy helps WECF to become aware of any inconveniences felt and to enable WECF to deal with the complaints.
3. WECF's stakeholders include:
 - a. Partner organisations
 - c. Donor agencies with whom WECF has, or wishes to have, a funding relationship
 - d. Other natural or legal persons that deliver services to WECF
 - e. Any other party with whom WECF is maintaining or aiming a working relationship (e.g. joint ventures, coalition partners)
4. WECF does not maintain direct working relationships with final beneficiaries. Their satisfaction is therefore beyond the scope of this policy and only indirectly sensed through WECF's partners that offer services directly to the final beneficiaries.
5. All WECF staff members have the responsibility to ensure that partners are informed about the existence and purpose of WECF's stakeholder satisfaction policy.
6. All WECF staff members have the responsibility to identify inconveniences in any working relationship that they maintain. Complaints are summarized in a report that give a reflection of both the WECF staff member as well as the view of the stakeholder and shall be shared with the stakeholder. The WECF staff member assesses whether any inconvenience aired by the partner is a real complaint about WECF.
7. In case the partner confirms that there is a complaint that has to be addressed, the WECF staff member reports the complaint to the Board of Directors and advises how to deal with the complaint.
8. The Board of Directors decides on the action needed.
9. The responsible manager informs the respective stakeholder when the action is fulfilled.

10. Complaints are registered in the Incident Register, which is discussed at least annually with the Board of Trustees, and annually at strategic meetings with staff and monthly at meetings of the Board of Directors.
11. Complaints about a responsible manager are dealt and acted upon by the Executive Director.
12. Complaints about the Executive Director are dealt and acted upon by the Board of Trustees.
13. In case the stake holder has an urgent or serious complaint, the complaint will be sent directly to the Executive Director or, in case it concerns the Director, the Board of Trustees.
14. WECF aims to act upon complaints as quick as possible. All complaints are, in principle, treated as confidential.
15. There is no procedure for lodging an appeal other than resubmit the same complaint.
16. No rights can be derived from this internal policy.



WECF's Sanction Policy

WECF regularly enters into contract or agreement with partner organizations and consultants. Usually those contracts are completed up to the satisfaction of all parties concerned. Occasionally it does however happen that contracts or other written or verbal agreements are not met. In such a situation WECF will first try to discuss and negotiate with the partner or other organization concerned to find a mutual solution for the problems or discrepancies occurring. This sanction policy applies to the rare situations in which the parties concerned do not reach a joint satisfactory solution, obliging WECF to take further steps.

Issues concerning sanctions of staff are dealt with in the Code of Conduct and related integrity policies.

Partner organizations

Partner organizations are members or non-members of the WECF network with whom WECF enters into an agreement whereby the partner organization commits itself to execute a project or several activities for which WECF allocates funds and/ or other support (e.g. advice).

Contracts

Basis for the agreement is a standardized written contract typically under Dutch law. Specific clauses in the contract which form the basis of this sanction policy are:

- WECF reserves the right to terminate the contract and cease payments if the project contractor does not comply with the agreements as specified in the contract. The project contractor will not in any circumstances be entitled to claim reimbursement.
- WECF has the right to withhold part of the payment if the project contractor has not been able to carry out the tasks as agreed.
- The venue for any disputes arising out of or in connection with the contract shall only be the courts of Utrecht (The Netherlands) – to the extent permitted by applicable law.

Reporting

Agreed, time-bound goals and budgets are spelled out in the contract including agreements on narrative reporting, financial reporting and auditing. Payments are made in instalments. Instalments are linked to actual implementation and reporting.

Monitoring and Evaluation

During project implementation the responsible project manager monitors the implementation of the project, based on monitoring sheets with outcomes and outputs as well as financial checks of receipts of actual spending. Project partners are visited by WECF staff and/ or external evaluators (regularly or at project ending, depending on scope of project) who compare reported results with results in the field via focus interviews with beneficiaries, visits of projects, visits of partner offices.

Sanctions

Situations in which sanctions might become necessary are:

- Activities are not implemented or not implemented completely
- Funds and other means allocated are used for different purposes than agreed upon
- The partner does not fulfil the administrative obligations agreed upon (e.g. reporting)
- Proven fraudulent actions of the partner organization within and/or outside the specifically agreed upon project

Possible sanctions include:

- No payment or later payment of further instalments
- Termination of the contract
- A legal procedure requesting to the partner to refund (a part) of the already paid instalments
- Court case to claim refund of money

Reporting, transparency and learning

All cases that needed sanctions are reported in the Incident Register, which is subject of discussion during our annual strategic meetings, as well as the monthly meetings of the Board of Directors and at least annually put on the agenda of the Board of Trustees. In this way we want to make sure we learn and improve our screening of partners in order to prevent the necessity of sanctions in the future.

Procedures

Cause	Sanction	Decided by:	Notification by:	Appeal to
Late or incomplete reporting	Send e-mail reminder and a new one with 2-week deadline Postponement of next payment instalment till partner has fulfilled the obligations; partner is informed about definite sanctions (see below)	Responsible project manager	By e-mail By e-mail followed by a letter signed by the Executive Director	Executive Director
Activities are not	Postponement of next payment instalment	Responsible project manager	By e-mail	Executive Director

implemented completely or not up to standard and this is verified by WECF staff or an external expert or evaluator	Payments will be stopped till situation is rectified	Responsible project manager informs Executive Director	Signed letter	Executive Director
	Contract will be terminated if partner fails to rectify, no further payments	Executive Director	Registered letter	Board of Trustees
Funds and/ or other means are allocated for other purposes than agreed upon in the contract and budget and this is verified through WECF (financial) staff or an external evaluator	Initial observations will be shared with partner and partner will be asked to explain deviances. If no satisfactory explanations are provided the contract will be terminated, no further payments	Executive Director	Registered letter	Board of Trustees
Proven fraudulent or corrupt actions*, preferably verified by an external party	Contract will be terminated, possible legal actions to claim money back, exclusion from future projects	Executive Director	Registered letter	Board of Trustees

* Please read our Anti-Fraud and Anti-Corruption Policy