

PIN Code of Conduct and Key Policies

January 2026

In case you have any feedback or suggestions concerning these guidelines,
please send them to policy@peopleinneed.net

PIN Code of Conduct Scheme

Click on the specific policies for quick navigation.



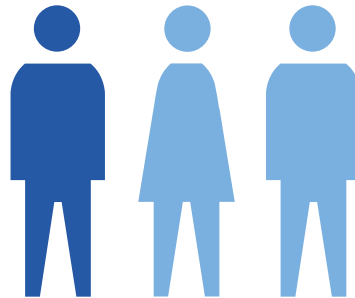
Safety and Security Policy



Conflict of Interest Policy



Gender Equality and Social Inclusion Policy



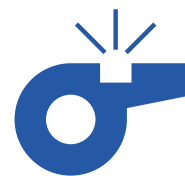
Code of Conduct



Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment Policy



Anticorruption Policy



Whistleblowing Policy

Content

PIN Code of Conduct and Key Policies	1
PIN Code of Conduct Scheme.....	2
Content.....	3
1. Introduction.....	6
2. Applicability.....	6
3. Obligation to report and investigate all breaches.....	8
4. PIN response to breaches.....	9
5. Monitoring and review.....	9
PIN Code of Conduct	10
1. Introduction.....	12
2. Basic Principles of Our Work.....	12
3. Scope of Applicability of the Code.....	13
4. Standards of Behaviour.....	13
4.1. No discrimination, bullying, harassment, or intimidation.....	13
4.2. Protection of children and no sexual or other abuse.....	13
4.3. No participation in activities which are illegal or which might compromise the activities and reputation of PIN.....	14
4.4. No corruption and no conflicts of interest.....	14
4.5. No damage to property and no misuse of information.....	15
4.6. Responsibility for health and safety.....	15
5. Breach of the Code.....	15
6. Annex I: Country Program-Specific Addendum on Alcohol Consumption.....	17
6.1. Applicability.....	17
6.2. Clarification on Alcohol Consumption.....	17
6.3. Implementation.....	17
6.4. Final Note.....	17
Key PIN Policies	18
PIN Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment Policy	19
1. Introduction.....	20
2. Terminology.....	20
3. Applicability.....	20
4. Core Principles.....	21
5. Safeguarding Pillars.....	23
5.1. Identify and mitigate the risk of sexual exploitation, abuse and harassment and other harms by PIN staff and associates.....	23
5.2. Prevent Staff training and awareness.....	23
5.3. Report.....	24
5.4. Response.....	25
5.5. Learn.....	25
6. Safeguarding in PIN Programmes.....	25
6.1. Safeguarding, risk identification and Mitigation:.....	25
6.2. Transparency and Fairness in Assistance:.....	26
6.3. Staff sensitization on ethical conduct and communication with aid recipients:.....	26
6.4. Community Feedback and Response Mechanism (CFRM):.....	26
7. Roles and Responsibilities.....	27
7.1. PIN Management and Country Directors:.....	27
7.2. PIN RDD Accountability and Safeguarding Unit.....	27
7.3. All PIN Staff, Volunteers, Visitors, Partners, and Representatives.....	27
7.4. Managers and Senior Management Teams.....	27
7.5. Human Resources Team.....	28
7.6. Safeguarding staff at CP level.....	28
7.7. CFRM Staff.....	28
8. Annex I. – Forms of unacceptable behaviour, terminology.....	28
8.1. Abuse.....	28
8.2. Bullying.....	28
8.3. Examples of Bullying Behaviors:.....	29
8.4. Child abuse.....	29

8.5. Conflict of interest	30
8.6. Corruption	30
8.7. Discrimination	30
8.8. Exploitation	31
8.9. Fraud	32
8.10. Harassment	32
8.11. Trafficking in persons	32
8.12. Intimidation	33
8.13. Modern Slavery	33
8.14. Sexism	33
PIN Gender Equality and Social Inclusion Policy	35
1. Introduction	36
2. Applicability	37
2.1. This Policy is applicable for PIN RDD CZ and for PIN UK	37
3. Policy statement and objective	37
4. PIN Core Principles and Commitments	37
4.1. Promoting Gender Equality and Social Inclusion in PIN's CULTURE and working environment	37
4.2. Promoting Gender Equality and Social Inclusion in PIN PROGRAMS	39
5. Roles and Responsibilities	41
PIN Anticorruption Policy	43
1. Introduction	44
2. Terminology	44
3. Standards of conduct in relation to corruption	44
4. PIN commitments	45
5. Annex I	46
5.1. List of potential indicators of bribery and corruption	46
PIN Conflict of Interest Policy	48
1. Introduction	49
2. Terminology	49
3. Standards of conduct in relation to conflict of interest	49
3.1. Conduct forbidden to PIN staff and associates	49
3.2. Forms of conduct or situations which need to be consulted	49
4. Procedures for resolving conflict of interests	50
PIN Whistleblowing Policy	51
1. Whistleblowing and the <i>Code of Conduct</i>	53
2. Who Submits a Report?	53
3. Who Can Breaches of the <i>Code</i> Be Reported to?	53
3.1. severity of breach of the <i>Code</i>	53
3.2. subjects of reporting (i.e. who submitted the report against whom)	53
4. Procedure for Reporting Breach of the <i>Code</i>	54
4.1. Reporting of minor breaches of the <i>Code</i> (complaints)	54
4.2. Reporting major breaches of the <i>Code</i> (whistleblowing)	54
4.3. Reporting in accordance with the Whistleblower Protection Act (<i>WPA</i>)	55
4.4. Procedure for reporting major breaches of the <i>Code</i> on a PIN mission abroad	55
5. Complaints by Recipients of Aid Directed Against PIN Associates	56
5.1. Procedure for handling of complaints and submission of feedback abroad (CFRM)	56
6. What Should the Report Look Like?	56
7. What Happens After Breach of the <i>Code</i> Is Reported?	57
8. What Will the Result of the Internal Investigation Be?	59
8.1. Assessment that the report is unjustified (there was no breach of the <i>Code</i>) or unsubstantiated (sufficient evidence cannot be provided):	59
8.2. Assessment that the report is justified and substantiated and that the <i>Code</i> has been breached:	59
8.3. Assessment that the report is knowingly false based on intentionally false facts:	59
8.4. Assessment that the report is not, but should have been, a report submitted in accordance with the <i>WPA</i> or that such report is unjustified:	60
8.5. Assessment that the report is justified and that it concerns a complaint by recipients of aid abroad:	60
9. Deadlines for Handling Reports	60

9.1. The justification of a report which has been submitted must be assessed and investigated within 30 days of its receipt. In factually or legally complex cases, this deadline may be extended by up to 30 days.	60
9.2. In the case of a submission in accordance with the WPA, the deadline may be extended by 60 days (the whistleblower will be informed of the extension and the reasons for it).	60
10. Is There a Record of Reports Which Have Been Submitted?	60
11. Basic Principles of Investigation of a Report	60
11.1. Confidentiality	60
11.2. Protection from retaliation	61
11.3. Due process	61
12. Summary of Major Breaches of the Code	61
12.1. Discrimination	61
12.2. Harassment	61
12.3. Intimidation and bullying	61
12.4. Abuse of position and power	61
12.5. Causing any harm to children	62
12.6. Sexual or other abuse of persons.....	62
12.7. Violation of the law and support for criminal activity.....	62
12.8. Corruption	62
12.9. Conflict of interests.....	62
12.10. Damage to property, including misuse of funds	62
12.11. Misuse of information.....	62
PIN Safety and Security Policy.....	63
1. Applicability	64
2. Introduction.....	64
3. Key security strategies and principles	64
3.1. Acceptance and integration into community	64
3.2. Protection measures	64
3.3. Deterrence as a last resort	64
4. Roles and responsibilities	65
4.1. Senior management roles and responsibilities	65
5. Staff roles and responsibilities	66
5.1. Security is everyone’s job and concern	66
5.2. Impact of individual action	67
5.3. Respecting PIN Code of Conduct and local culture	67
5.4. All security incidents must be reported	67
5.5. Compliance with the security procedures.....	67
5.6. Adequate staff induction.....	67
6. Health and Safety	67
6.1. PIN obligations related to work safety	67
6.2. Employee’s health and responsibilities	67
6.3. Insurance coverage	68
6.4. Vaccination.....	68
6.5. Country specific Medical Plans.....	68
6.6. Other country specific guidance and provisions.....	68
6.7. First aid.....	68
7. Operational procedures	68
7.1. Country/regional risk analysis	68
7.2. Risk assessment and Security Management Plan (SMP) come first	69
7.3. Role of field offices.....	69
7.4. Crisis and incident management	69
7.5. Evacuation and relocation principles	69
7.6. No use of firearms	70
7.7. Abduction, kidnapping and no-ransom policy.....	70
7.8. Cyber security.....	70
7.9. Safeguarding and security	70
7.10. Utilization of media and social networks	71
8. Final waiver.....	71
9. Supporting and related documents.....	71
People In Need Staff Informed Consent	73

1. Introduction

People In Need (PIN) is a non-governmental, non-profit organisation providing relief and development assistance worldwide. PIN is committed to the best practice and quality of work of its staff, its partner organisations and other associates.

The set of *Key PIN Policies* presents a detailed guide on the most important standing points, which are essential for our work and map our goals and vision.

The *PIN Code of Conduct* represents the essence of the *Key PIN Policies* and provides clear guidance on the standards of behaviour required by all PIN staff.

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

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

2. Applicability

These policies are applicable for RDD of PIN CZ and for PIN UK. For other entities and departments of People in Need specific versions might exist. I.e. the *PIN Code of Conduct* and *Key PIN Policies* are applicable for all full time and part time PIN Relief and Development department's (RDD) staff, members of PIN board of directors, volunteers, interns, consultants, visitors, people acting on behalf of PIN (further referred to as "PIN staff") and – to the relevant extent as per the table below – to PIN RDD's suppliers and partner organizations¹ (further referred to as "PIN associates"), unless stated otherwise within the respective policies. This Code of Conduct and Key PIN Policies are applicable both inside and outside of office hours.

The *PIN Code of Conduct* and *Key PIN Policies* create an inseparable part of contracts with all PIN RDD's staff and have to be reflected – to the relevant extent – in all contractual relationships with PIN associates. Understanding and acceptance of these policies is done by signature of contract with PIN and attendance sheets distributed during PIN staff trainings.

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

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

3. Obligation to report and investigate all breaches

Any known or suspected cases of abuse, exploitation, harassment or other forms of unacceptable behaviour which are in direct breach of the *PIN Code of Conduct* and the *Key PIN Policies* must be brought to the attention. The following channels might be used proportionally to the potential severity of the complaint:

Complainant	Type of Complaint / Report	Report to	Procedure / Channel ²
PIN Beneficiary / Community Member	Concerns, complaints, or allegations related to program delivery or staff conduct	Country Programme Management or Designated Focal Point	Community Feedback and Response Mechanism (CFRM) Internal Reporting System (IRS) Local reporting channels (verbal, boxes, hotline, etc.)
PIN Associate (staff, volunteer, contractor)	Minor complaints (e.g., working conditions, task issues, colleague conflict)	Line Manager or Next-Level Supervisor	In person, via email, or verbally
PIN Associate	Complaint involving Country Director or HR issue	RDD HQ Management or PIN HR Department	In person or via email
PIN Associate	Major breach: abuse, SEA, fraud, corruption, conflict of interest, etc.	Designated Focal Point (in CP or HQ) PIN Internal Reporting System (IRS)	Email: whistleblowing@clovekvtsni.cz Mail: Šafaříkova 24, Prague 2, marked "Do not open – for addressee only" IRS: https://www.clovekvtsni.cz/vnitрни-oznamovaci-system-7s
PIN Associate or Third Party	Serious concern where other channels are unsafe or compromised	Designated focal point at HQ via the IRS system	Any official channel including anonymous email, hotline, secure mail, or verbal/in-person (by appointment)
PIN Associate	Complaint involving PIN or PIN UK Directors	PIN Board of Trustees or PIN UK Board of Trustees	In person or in writing
Third Party (partner, supplier)	Misconduct by a PIN associate	Designated Focal Point (in-country or HQ)	Verbal, written, or through any PIN-recognized reporting channel (CFRM, email, hotline)

² Whilst respecting GDPR, serious complaints received by PIN through the listed channels, will be shared with PIN UK's Director and Board of Trustees when the complaint concerns projects or operations supported by PIN UK.

4. PIN response to breaches

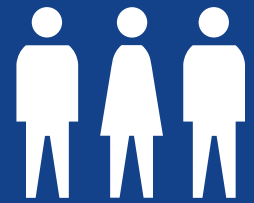
In cases of substantial breaches of the *PIN Code of Conduct* and *Key PIN Policies*, PIN will take immediate and appropriate action and will support the needs of those affected. This might include:

Category	Consequence in Case of Code Violation
PIN full-time or part-time staff	Disciplinary action in line with the Principles of Disciplinary Procedure, up to and including dismissal.
PIN volunteers and interns	Action in accordance with contractual terms, up to termination of engagement and possible future disqualification.
PIN consultants	Termination of contract, with potential notification to relevant professional or legal bodies depending on severity.
Visitors to PIN	Suspension or cancellation of visit, and possible permanent restriction from future access or collaboration.
PIN associates (external workers, freelancers, etc.)	Action according to their contract, including immediate termination for major breaches.
PIN partner organisations	Corrective actions per partnership agreement, up to withdrawal of funding/support or termination of the partnership.
Whistleblowers (internal or external)	No punitive action if acting in good faith. Retaliation is prohibited. False reports made maliciously may result in disciplinary or legal action.

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

5. Monitoring and review

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



PIN Code of Conduct

In case you have any feedback or suggestions concerning these guidelines, please send them to policy@peopleinneed.net

Name of regulation	PIN Code of Conduct
This regulation relates to (name of primary regulation)	N/A
Scope of applicability (e.g. all employees, name of section, ...)	All employees/associates
Approved – by whom	Executive Board
Approved – when	7 October 2024
Responsible person – department/position/person's name	Anna Soumarová, HR and Operations Director
Language versions	CZ, ENG
Version number of the regulation and effective date	V2_2024, effective as of 1 November 2024
Description of changes compared to the previous version	Complete revision – uniform for the entire organisation

1. Introduction

- People in Need (hereafter referred to as PIN) is a non-governmental, non-profit organisation committed to the ideas of humanism, freedom, equality and solidarity. We consider human dignity and freedom to be fundamental values. We believe that people living anywhere in the world should have the right to make decisions about their lives in accordance with the *Universal Declaration of Human Rights*³.
- PIN promotes democracy and advocates the protection of human rights at home and abroad. In the Czech Republic, we provide counselling and educational services aimed at improving the social situation of disadvantaged individuals and families. We also provide humanitarian and development aid around the world.
- PIN strives for an open, informed and engaged society with a responsible approach to problem solving. We want to actively contribute to cultural, ethnic, racial and other differences being seen as a source of mutual enrichment, not as a source of conflict.
- PIN is part of civil society. The personal commitment of our employees, volunteers and partners, both in the Czech Republic and in all countries where we work, forms the main pillar of our activity. However, we cannot get by without the trust and support that individuals, companies, governments and international institutions provide.

2. Basic Principles of Our Work

- The purpose of this Code is:
 - to protect individuals from unethical behavior, with priority protection for vulnerable groups and persons in a position of power (or otherwise) disadvantage,
 - to protect the organization's property,
 - to create, maintain and deepen public trust (clients of social services, recipients of aid, partners and other persons) towards PIN,
 - to contribute to the creation of mutual respect and trust among PIN associates and to motivate them to act ethically.
- All forms of abuse of power are contrary to our fundamental values and beliefs about the right to human dignity.
- PIN is committed to making every effort to ensure the high quality of work not only of its employees but also of partner organisations and other associates. Our goal is to achieve the best possible results in our day-to-day operations while following ethical principles that meet the highest expected standards.
- The Code sets out the rules for all PIN associates as well as for the other entities listed in the *Scope of applicability* section. Conduct at variance with this Code is unacceptable and may lead to disciplinary action and termination of cooperation.
- Recognizing the cultural and legislative differences of all countries in which PIN operates, this Code is based on international legal standards, universal principles of similar codes of conduct, and a commitment to promote and respect universal, inherent, inalienable and indivisible fundamental human rights as formulated in particular in the *Universal Declaration of Human Rights*, the *UN Convention on the Rights of the Child*, the *UN Convention on the Elimination of All Forms of Discrimination against Women* and other universal and regional human rights mechanisms; in the text of the Code, these rights are collectively referred to as “**fundamental human rights**”.
- The Code forms a common basis for individual policies which further elaborate the values and rules enshrined in the Code. These policies represent a main pillar of the work of PIN and should be understood together with the Code as a single set of binding rules. This concerns the following policies:

³ The Universal Declaration of Human Rights was adopted by the General Assembly of the [United Nations](#) on 10 December 1948.

- Anti-Corruption Policy
- Conflict of Interest Policy
- Whistleblowing Policy

3. Scope of Applicability of the Code

- The Code is binding for all employees, other full-time and part-time workers of PIN, volunteers, interns, consultants or trainees, members of the Supervisory Board and the Board of Directors, and all other persons acting on behalf of PIN (hereinafter referred to as “**associates**”). The Code is also binding for associates working with PIN’s sister organisation, People in Need UK, which is based in the United Kingdom of Great Britain and Northern Ireland.
- The Code is a basic set of rules that applies to the entire organisation. The individual sections of PIN may further develop more specific internal rules, but these must always respect and comply with the Code.
- The Code may apply to partner organisations or organisations supported by People in Need if they do not have their own Code or other similar regulations embodying the principles set out in this Code. If third parties will be working with clients of social services or recipients of aid from PIN, it is necessary to consider whether the Code will also apply to them.
- PIN associates must comply with the Code at all times during working hours and outside of working hours when their activities and behaviour may affect or be associated with the reputation and good name of the organisation. However, on PIN missions abroad, the Code applies both during and outside working hours without exception.

4. Standards of Behaviour

PIN associates agree to adhere to the **highest standards of** personal and professional conduct and the **rules** listed below:

4.1. No discrimination, bullying, harassment, or intimidation

- All people around the world are entitled to be treated with dignity. All forms of discriminatory conduct on the basis of race, gender, religion, beliefs or opinions, social status, colour of skin, national or ethnic origin, socio-economic status, age, ability, sexual orientation or other differences are prohibited. PIN is committed to creating a safe environment in which any such discriminatory behaviour is effectively prevented.
- PIN associates are obliged to treat every person they come into contact with in the course of their work, especially clients of social services and recipients of aid, their colleagues and partner organisations, with respect and to refrain from any discriminatory behaviour, humiliation, degradation or psychological abuse, including bullying and abuse of power.
- Psychological and physical violence, except in the event of an extreme emergency and self-defence, is totally unacceptable.
- Inappropriate, aggressive or abusive verbal or written language is unacceptable. PIN associates must communicate and behave in a manner appropriate to the situation and their position. By doing so, they contribute to creating a positive perception of the organisation.
- PIN expects its associates to act with honesty and integrity.

4.2. Protection of children and no sexual or other abuse

- The abuse or exploitation of children and adults in ways or for activities which are in any way contrary to fundamental human rights is prohibited.
- PIN emphasises the protection and well-being of children in all its programs. Any action which could cause harm to children, including physical or psychological abuse or neglect, is prohibited.

- Any form of sexual relationship with a child is prohibited regardless of the age of consent or the child's consent. A child is a person under the age of 18⁴. The argument that the person looked older cannot be used as an excuse.
- Any form of sexual violence and aggression, including sexual exploitation, abuse or harassment, is prohibited. It is also completely unacceptable for PIN associates to abuse their position to demand sexual or other favours. Relationships between PIN associates and the clients of social services or recipients of aid are also unacceptable, as such relationships are inherently based on unequal power dynamics.
- PIN prohibits any conduct, comments or gestures with sexual overtones which may cause a sense of threat or humiliation, including inappropriate statements and innuendo with sexual overtones, unwanted physical contact, or sharing of inappropriate material, whether via email, social media, or otherwise.
- Behaviour which exploits others in the broadest possible sense (sexual, economic or social, etc.) is prohibited. PIN condemns the exchange of money, goods, services or other benefits for sexual services.

4.3. No participation in activities which are illegal or which might compromise the activities and reputation of PIN

- PIN is a politically and religiously impartial organisation. It does not participate in political activities or in the promotion of religious values in any way which could negatively impact the organisation's goals or damage or compromise the perception of PIN as an impartial defender of human dignity, fundamental human rights and democracy.
- The private political activities of associates will not be deemed to be at variance with this Code as long as they are clearly separate from the activities of PIN and cannot be linked in any way to the organisation. Participation of our associates in political activities or the promotion of their own religious values may be restricted or prohibited in some countries where we operate in cases where such restriction or prohibition could adversely affect the objectives of PIN's work or damage the perception of PIN as a politically and religiously impartial organisation, and where such restriction or prohibition is not contrary to the regulations of the country in question.
- Violations of the law which would have a negative impact on individuals or the organisation's property are unacceptable, as is any support for criminal activity. However, if the Code prohibits participation in illegal or criminal activities, such prohibition does not apply to activities which, although considered illegal in the country in question by local regulations or the decisions of local authorities, are expressions of support for or exercising of fundamental human rights.
- PIN associates working abroad are obliged to comply with the laws and cultural norms of the country in question, except where such laws or cultural norms conflict with or undermine the legal standards, universal principles and fundamental human rights protected by this Code.
- PIN associates must take care to avoid behaviour or actions which could compromise the activities or damage the reputation and good name of the organisation.

4.4. No corruption and no conflicts of interest

- Any form of corrupt or fraudulent behavior is prohibited.
- PIN defines corruption as abuse of position by associates for the purpose of obtaining undeserved personal gain or advantage. In particular, this includes cases of bribery and acceptance of bribes, loans, rewards and commissions or the giving and receiving of any other considerations or advantages, as well as any deceptive conduct and embezzlement, agreements restricting open competition and money laundering. Further details are described in the *Anti-Corruption Policy*.

⁴ Convention on the Rights of the Child. In the Czech Republic, the age of consent for sexual intercourse is 15 and this lower age limit will be respected in the Czech Republic if this concerns the voluntary, uncoerced and consensual decision of both persons.

- PIN associates must not use their position for personal gain or advantage and must avoid any situation in which private interests may conflict with the interests of the organisation. The basic principles and procedures for preventing such situations are set out in the *Conflict of Interest Policy*.
- PIN considers a conflict of interest to be a situation where the impartial and objective performance of duties or the unbiased decision-making of associates is compromised or called into question due to a conflict with personal, family, political, economic or other interests.

4.5. No damage to property and no misuse of information

- The property, funds, and other PIN resources must be used responsibly, in the interest of the organisation, and in accordance with the relevant policies. The property of PIN must not be used for illegal activities⁵. All funds entrusted and services provided must be used appropriately and responsibly. Intentional or grossly negligent damage to the organization's property constitutes a breach of the Code.
- Sensitive information (e.g., staff-related or financial) which would damage or compromise the organization's operations, its clients and associates, as well as sensitive information related to the activities of PIN, which is subject to the more specific rules of the respective section, must not be shared outside the organisation verbally, in writing, through the media, social media or otherwise, except in situations where required by law, but always subject to compliance with the established security rules and protocols. Sharing of such data within the organisation is only possible between persons authorized to handle such data.
- The handling and protection of personal data is governed by the separate *Personal Data Processing Policy*.

4.6. Responsibility for health and safety

- Associates are obliged to comply with the safety regulations applicable in the Czech Republic and abroad.
- PIN associates are required to conduct themselves in a manner which does not endanger their own health and safety or the health and safety of their colleagues and others. This responsible approach is also required in relationships with partner organizations, clients of social services and recipients of aid.
- PIN associates must not consume alcoholic beverages or use other addictive substances at the workplace or even outside the workplace during working hours and must not enter the workplace under their influence. The prohibition on the consumption of alcoholic beverages does not apply to employees whose consumption of such beverages is part of or normally associated with the performance of their duties at work.

5. Breach of the Code

- Any breach of the Code must be reported in line with the [Whistleblowing Policy](#), which sets out the procedure for submission of reports, distinguishes between major and minor breaches of the Code, and explains the process for investigating reports which are submitted. Major breaches of the Code must be reported at all times and under all circumstances.
- Every report of a breach of the Code will be investigated promptly, thoroughly, confidentially and sensitively.
- The person against whom the report has been made has the right to explain his or her behaviour and to respond to the allegations made; he or she shall be regarded as blameless until the investigation is concluded. If the nature of the report or investigation means that the person under investigation

⁵ In the context of this paragraph, illegal activities do not include activities which, although considered to be prohibited in the country in question, are expressions of support for or exercising of fundamental human rights.

must be suspended from holding his or her current position, the procedure will be followed in line with the Whistleblowing Policy.

- PIN will adopt all necessary steps to prevent any form of retaliation against persons who have reported any breach of the Code, persons conducting an investigation, or persons against whom a report has been made unless the investigation has been concluded or the report is deemed unjustified.
- Knowingly false accusations made with the intent to harm another person are completely unacceptable and shall be deemed to be a major breach of the Code. Apart from disciplinary action, such accusations may be referred to the law enforcement authorities for further investigation.

Name of regulation	Country Program-Specific Addendum on Alcohol Consumption
This regulation relates to (name of primary regulation)	Code Of Conduct
Scope of applicability (e.g. all employees, name of section, ...)	All employees/associates
Approved – by whom	RDD Directorate
Approved – when	18.03.2025
Responsible person – department/position/person’s name	Jan Mrkvicka RDD Director
Language versions	ENG
Version number of the regulation and effective date	V1_2025, effective as of 1 April 2025
Description of changes compared to the previous version	No previous version – to be adapted across RDD country programs

6. Annex I: Country Program-Specific Addendum on Alcohol Consumption

6.1. Applicability

This addendum applies to PIN Country Programs where additional restrictions on alcohol consumption are required due to legal, cultural, or operational considerations. The global PIN Code of Conduct remains the primary guiding document, and this annex provides further clarification for implementation at the country level.

6.2. Clarification on Alcohol Consumption

PIN associates are expected to maintain professionalism at all times, which includes avoiding alcohol consumption or any substance use that may impair their judgment, behaviour, or ability to perform their duties.

- **General Policy:** Employees must not be under the influence of alcohol or other substances while at work or when representing PIN in a professional capacity.
- **Exceptions:** Any exceptions must be explicitly defined by local regulations, cultural norms, and official work-related functions (e.g., diplomatic or official events).
- **Local Compliance:** In country programs where alcohol consumption is considered inappropriate or restricted by law, local guidelines shall apply in addition to PIN's global policy.

6.3. Implementation

Country Programs should ensure that:

- National Staff Handbooks reflect this addendum, ensuring all employees are aware of the specific country-level regulations.
- Managers and HR teams provide clear guidance on situations where alcohol consumption may or may not be considered appropriate.
- Any violations are addressed through existing disciplinary measures in line with PIN's global Code of Conduct.

6.4. Final Note

This annex does not replace the global PIN Code of Conduct but rather ensures alignment with legal and cultural realities in different operational contexts.



Key PIN Policies



PIN Safeguarding and Protection from Sexual Exploitation, Abuse and Harassment Policy

In case you have any feedback or suggestions concerning these guidelines, please send them to policy@peopleinneed.net

1. Introduction

People In Need (PIN) recognises that especially in situations of poverty, natural or man-made disasters humanitarian crisis and/or conflict, people affected by crisis, children especially, can be extremely vulnerable due to disrupted access to basic necessities, protection, and support. This leaves them at heightened risk of exploitation, neglect, and harm, not only from community members but also from personnel of organizations operating in these contexts. The **safeguarding, safety and well-being of vulnerable children and adults who come into contact with PIN staff and associates are of utmost importance to us**. We therefore acknowledge as our fundamental duty to protect all vulnerable people engaged within our programmes and activities from any forms of harm caused by PIN's staff and associates, particularly Sexual Exploitation, Abuse and Harassment (SEAH) that may be caused by PIN's staff and associates, and to maintain a dignified working environment free from any potential harassment, abuse and exploitation.

By determining PIN's commitment to safeguard children and vulnerable people, [this Policy has the following objectives](#):

- **To protect people and communities affected (both children and adults)** engaged in PIN's programmes from all forms of abuse and exploitation that may be caused by PIN's staff and associates.
- **To protect PIN staff** from all forms of abuse (e.g sexual violence, discrimination, etc.) and any potential false or malicious allegations of misconduct.
- **To protect PIN's organisational integrity and reputation**, as well as that of its partners, by introducing sound Safeguarding Policy that helps to understand rights and responsibilities of concerned parties.

The policy lays out the commitments made by PIN to safeguard children and vulnerable people, and informs PIN's staff and associates⁶ of their responsibilities in relation to safeguarding.

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

2. Terminology

Safeguarding (SG) refers to the responsibility of organisations to ensure that their staff, associates, operations, and programmes do no harm to children and vulnerable adults. This includes preventing any risk of harm, abuse, or exploitation caused by PIN's staff or associates. Key components under this umbrella term include protection of Sexual Exploitation, Abuse and Harassment (PSEAH) and child protection⁷.

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

3. Applicability

The PIN SG and PSEAH Policy is binding for all employees, other full-time and part-time workers of PIN, volunteers, interns, consultants or trainees, members of the Supervisory Board and the Board of Directors, and all other persons acting on behalf of PIN (hereinafter referred to as "**associates**"). This Policy is also

⁶ See 'Applicability' for definition of associated personnel

⁷ This definition is adapted from [Safeguarding definitions and reporting mechanisms for UK NGOs](#), BOND website

binding for associates working with PIN's sister organisation, People in Need UK, which is based in the United Kingdom of Great Britain and Northern Ireland.

The Policy builds upon the principles outlined in the PIN Code of Conduct, providing additional guidance on safeguarding, including PSEAH and child protection. Individual sections of PIN may develop more specific internal rules to address their operational needs, provided these rules align with and uphold the standards set out in this Policy and the Code of Conduct.

This Policy may apply to partner organisations or organisations supported by PIN if they do not have their own SG and PSEAH Policy or other similar regulation embodying the principles set out in this Policy. If third parties will be working with clients of social services or recipients of aid from PIN, it is necessary to consider whether this policy will also apply to them.

PIN associates must comply with this Policy at all times during working hours and outside of working hours when their activities and behaviour may affect or be associated with the reputation and good name of the organisation. However, on PIN missions abroad, the Policy applies both during and outside working hours without exception.

4. Core Principles

PIN is committed to safeguarding vulnerable adults and children and ensuring the integrity of its operations. This commitment is based on international and national standards, including the UN Convention on the Rights of the Child and its optional protocols, relevant UN safeguarding frameworks—such as the standards set out in the Secretary-General's Bulletin: Special measures for protection from sexual exploitation and sexual abuse (ST/SGB/2003/13)—and national legislation.

PIN has adopted the six Inter-Agency Standing Committee (IASC) Core Principles on Sexual Exploitation and Abuse (SEA) as a foundation for its safeguarding approach.

By uniting child safeguarding, adult safeguarding, and protection from sexual exploitation, abuse, and harassment (PSEAH) under one policy, PIN ensures a consistent and comprehensive approach. This integrated framework helps prevent harm, ensures appropriate response to concerns, and promotes a safe and respectful environment for all.

1. SEAH and Child abuse by PIN Staff and associates constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of the majority or age of consent locally. Mistaken belief in the age of the child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior by PIN staff and associates is prohibited. This includes the exchange of assistance that is due to program participants.
4. Any sexual relationships between PIN staff and aid recipient or their immediate relatives that involves improper use of rank or position is prohibited. Such relationship is likely to be based on inherently unequal power dynamics and may undermine the credibility and integrity of our organization and our work.
5. Where PIN staff or associate develops concerns or suspicions regarding SEAH and child abuse by a fellow worker, whether in PIN or not, he or she must immediately report such concerns via the established PIN reporting mechanisms available in the PIN [Whistleblowing Policy](#).
6. PIN staff and associates are obliged to create and maintain an environment that prevents SEAH and child abuse and promotes the implementation of PIN Code of Conduct and related policies. PIN Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

The policy is built on a set of key principles that reflect PIN's commitment to preventing violence against children and vulnerable adults, protecting against sexual exploitation, abuse, and harassment by PIN staff and associates, and safeguarding the rights and well-being of all individuals engaged in our programs. These principles guide our actions and uphold our values:

1. **Zero Tolerance of Inaction:** SEAH, Child Exploitation and Abuse (CEA) and a range of non-sexual abuses of power (including bullying, discrimination, oppression, humiliation, etc.) perpetrated by PIN staff and partners against any individual regardless of age, gender, sexuality, disability, religion or ethnic origin are not tolerated. PIN operates on a zero-tolerance approach, acting on every allegation in a fair, reasonable manner and applying disciplinary sanctions, including employment termination. PIN will not knowingly engage—directly or indirectly—anyone who poses a risk to children or vulnerable adults. PIN works to prevent and minimize the risks of SEAH, CEA associated with its functions and programs, and trains its staff and associates on their obligations under this policy.
2. **Strong Leadership for Culture Change:** PIN expects its leaders to set clear expectations and model respectful behavior. Strong leadership drives cultural change by addressing SEAH and CEA promoting diversity, inclusion, equality and safeguarding practices that prevent and reduce harm to children and adults.
3. **Survivor-Centered Approach:** In all cases of reported abuse, PIN will prioritize the rights, wishes, and well-being of survivors. We are committed to ensuring survivors' informed consent at every stage of the response process, while maintaining confidentiality and offering comprehensive support services. Guided by the *Do No Harm* principle, our approach ensures that the needs, dignity, and safety of victims/survivors are placed first, while also upholding procedural fairness for all parties involved.
4. **Shared Responsibility for Safeguarding:** Preventing SEAH and protecting children from harm caused by PIN staff and associates is a shared responsibility requiring the commitment and cooperation of PIN staff, partners, and stakeholders. Effective management of risks relies on collective support, investment, and action.
5. **Gender Equality and Social Inclusion (GESI):** PIN addresses gender inequality and other power imbalances in its programs. Engagement with aid recipients is based on respect for diversity, gender equality, and social inclusion, with an emphasis on accountability and a “Do No Harm” approach⁸.
6. **Accountability, Transparency, and Procedural Fairness:** PIN, its staff and its associates are accountable to aid recipients and the communities they serve. Transparent reporting and accountability mechanisms allow PIN to monitor SEAH and CEA, manage risks, and continuously improve safeguards. Decisions affecting individuals’ rights or interests are made with procedural fairness.
7. **Recognition of the Best Interests of the Child:** All actions and decisions are guided by the paramount principle of acting in the best interests of the child, ensuring their safety and protection in all PIN’s functions and programs.
8. **Governance and Risk Management:** At PIN, safeguarding is central to our governance and is integrated into our overall risk management framework. Safeguarding risks are included in our risk register, reviewed regularly by senior management and the Board of Trustees to ensure measures remain effective⁹. We prioritize safeguarding through regular reviews of our risk register, quarterly and annual reports, and updates to policies, including SG and PSEAH Policy and the Code of Conduct, every three years or as needed. These measures ensure PIN remains a safe, inclusive, and accountable organization, prepared to address safeguarding concerns globally.

PIN is dedicated to fulfilling the above stated core principles through the implementation of its five Safeguarding pillars.

⁸ For more information, refer to the [GESI Policy](#).

⁹ For further details, please refer to the PIN RDD Risk Management Policy, including the risk classification table and tools annexed, available on [ELO](#).

5. Safeguarding Pillars

5.1. Identify and mitigate the risk of sexual exploitation, abuse and harassment and other harms by PIN staff and associates

Understanding the risk of SEAH and designing mitigation strategies is a vital part of PSEAH. There is always a possibility of inflicting unintended harm, particularly in relation to vulnerable populations. To ensure that these risks are mitigated, PIN will:

- Ensure that protection risks, safeguarding, gender and inclusion considerations are always considered in all risk assessments (e.g., risk framework, risk management plan or approaches which assess and address risks for initiatives, including from a protection/safeguarding/gender and inclusion perspective).
- Undertake due diligence and capacity assessments including alignment with our values and objectives, governance and legal registration, financial systems, reference checks of partners, suppliers, third parties and CSO sub grantees against prohibited entities listings, and capacity assessment for implementation of key safeguarding and risk policies (e.g., child protection and prevention of SEAH).
- See [section Safeguarding in PIN Programmes](#).

5.2. Prevent Staff training and awareness

- PIN's **Code of Conduct** and the Key policies, including **PIN SG and PSEAH Policy**, are published, distributed, and known by those cooperating with PIN.
- PIN ensures all staff are familiar with and understand their responsibilities under PIN SG and PSEAH Policy. PIN staff receive training on the Code of Conduct and key policies, including Safeguarding, PSEAH and Child Safeguarding. Clear guidance on appropriate and inappropriate behaviour is also provided ([see Code of Conduct: Section Standards of behavior](#)). In addition, staff with specific responsibilities (e.g. managers) receive additional training tailored to their role, which includes recognizing and addressing safeguarding risks, appropriately handling reports and concerns, fostering a safe work environment, and ensuring compliance with PIN's Code of Conduct and related policies.

5.2.1. Safe Recruitment

- Stringent safeguarding procedures are implemented when recruiting, managing, and deploying PIN staff and associates.
- Safe recruitment principles are always applied to all recruitment processes.
- Special attention is given to the recruitment of personnel who will have direct or indirect contact with children.

5.2.2. Communities and affected people

PIN engages local communities and governments in preventing and responding to sexual exploitation, abuse and harassment and other forms of harm. Local communities are consulted in the development of the Community Feedback and Response Mechanism (CFRM) to ensure that the structure is both gender- and group-sensitive, inclusive, and culturally appropriate. This ensures that accessible and appropriate channels are available for all. The purpose of the CFRM is to ensure that all people affected in any way by PIN's work, including marginalized groups (such as women, people with disabilities, and minority populations), can safely report concerns without fear of discrimination or retaliation, and receive timely and appropriate responses that address their specific needs.

5.2.3. Partners, Suppliers and other third parties

- Before entering into any agreement, PIN conducts an assessment across various areas to evaluate the capacity of each partner, including safeguarding practices. This assessment helps PIN identify current safeguarding knowledge, gaps, and specific areas for improvement within partner organizations. Safeguarding assessment is an integral part of PIN's partnership assessment tool and process (due diligence process), both when selecting new partners and reviewing existing partnerships.
- PIN ensures that **when establishing partnerships, sub-grants, sub-recipient or supplier** agreements, these agreements:
 - a) include a digest of PIN Key policies (incl. this policy) as an attachment;
 - b) require entities, individuals, and their employees and volunteers to comply with a Code of Conduct aligned with the standards of this Policy;
 - c) explicitly state that failure to implement preventive measures against sexual exploitation, abuse, and child abuse, to investigate and report allegations, or to take corrective action when such incidents occur, will constitute grounds for PIN to terminate the agreement.
 - d) where required, include a capacity-sharing and strengthening plan based on assessment findings to enhance safeguarding measures within the partner organization. Additionally, tailored capacity support will be provided to ensure robust recruitment, safe program implementation, and effective responses to reports of abuse, varying by the type of partner organization
- Compliance with this Policy, PIN's Code of Conduct, and Key Policies is a prerequisite for any partnership, supplier agreement, or contract. If a partner organization or supplier fails to uphold these principles, PIN reserves the right to withdraw funding and/or terminate agreements. As PIN recognizes that partner organizations might have their own existing policies, codes or other instruments, this Policy and the *PIN Code of Conduct* does not seek to replace or nullify them.
- PIN ensures that all third parties, including partners and suppliers, commit to respecting the principles of the Code of Conduct and Key policies including the SG and PSEAH policy. When a third party has its own or follows another INGO's policy, PIN's policy applies if gaps exist; otherwise, an equivalent or stronger policy may be accepted.
- Partner organizations, including sub-grantees, must ensure their staff and associates adhere to key ethical principles and standards of conduct. They must also implement and monitor necessary procedures, including a Community Feedback and Response Mechanism (CFRM) for aid recipients and whistleblowing channels for staff. If such mechanisms are missing, PIN should support their establishment by providing technical expertise and capacity building.

5.3. Report

Staff members who have a concern or a complaint or concern relating to safeguarding **can also report it immediately to their Safeguarding Focal Point or line manager**. If the staff member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may use the reporting channels described below (i.e. CFRM and whistleblowing).¹⁰ For feedback, concerns and complaints that can come from people and communities affected, PIN has in place a functional **Community Feedback and Response Mechanism (CFRM)**¹¹

- For cases of reporting from PIN staff or associates, PIN has established whistleblowing Mechanism which lists available reporting channels. Reports can be submitted via the internal reporting system (IRS) to the designated focal point as follows:
 - in writing to People in Need, addressed to the designated focal points at HQ,

¹⁰ For more details about channels that might be used for reporting, please refer to PIN Code of Conduct, chapter *Obligation to report and investigate all breaches*.

¹¹ For more information, see the [global CFRM policy](#) and [its annexes](#).

- by email: whistleblowing@pinf.cz
- in person: by prior arrangement, by telephone or by email, it is possible to arrange a date for a face-to-face meeting, no later than within 14 days of the date on which whistleblower requests it.
- The IRS is available on the [PIN website](#)¹²

5.4. Response

PIN handles safeguarding concerns in accordance with its Code of Conduct, [Whistleblowing Policy](#), and PIN investigation guidelines. Complaints are registered securely, and investigations are conducted confidentially, sensitively, and promptly. Outcomes may lead to concern resolution or further actions, including disciplinary measures (e.g., suspension, dismissal) and reporting to authorities, with victim/survivor consent where required. Donors will be informed as appropriate.

If legal violations are identified, authorities will be notified, and the Subject of Complaint (SoC) may be suspended. PIN follows a victim/survivor-centered approach, ensuring access to support services such as medical care, legal aid, and counseling. Support in cases involving partners or third parties depends on their capacity, with PIN assessing unmet needs.

Complainants and survivors have the right to case updates. Confidentiality is maintained on a need-to-know basis, except where legal obligations override privacy. The SoC can present their perspective, and legal or expert advice may be sought. Proven cases result in appropriate disciplinary measures, while false allegations are addressed to protect the SoC's rights.

5.5. Learn

PIN ensures robust oversight of SEAH, child abuse, and misconduct reports through an independent MEAL unit and a comprehensive CFRM, allowing beneficiaries to report concerns and provide feedback. We actively seek regular input from the children and communities we serve, viewing every safeguarding concern as an opportunity to learn, adapt, and improve our practices. Partnering with organizations, PIN monitors safeguarding measures, regularly updating procedures based on feedback from stakeholders. Lessons learned from individual cases inform adjustments to program designs and policies. We ensure that children and families understand expected behaviors from our staff and representatives and know how to share concerns. To promote transparency and learning, PIN participates in global safeguarding forums, contributing to sector-wide best practices and continuous improvement.

6. Safeguarding in PIN Programmes

Safeguarding at the programme level ensures that all activities and interventions are designed, implemented, and monitored with the highest standards of safety, accountability and do no harm in mind. It involves proactively identifying and mitigating risks to vulnerable individuals and communities throughout the programme lifecycle (PCM).

This section outlines the key measures and responsibilities required to embed safeguarding principles into programme design, delivery, and evaluation, ensuring that all stakeholders are protected from harm at every stage. By integrating safeguarding into programme operations, we uphold our commitment to creating safe, inclusive environments for all.

6.1. Safeguarding, risk identification and Mitigation:

For all programmes involving direct interaction with vulnerable groups, PIN will integrate safeguarding measures at every stage—design, implementation, and evaluation. These strategies include:

¹² For more information, please refer to the PIN Whistleblowing Mechanism, the operation of which is outlined in the [PIN Whistleblowing Policy](#)

- **Regular monitoring and risk assessments:** Before starting any activity involving vulnerable groups, including children, women, the elderly and people with disabilities, PIN shall conduct a thorough risk analysis using **Respective PIN screening tools**. This assessment tool allows the identification of existing and potential risks that may arise during programme implementation.
- **Adapting plans to emerging risks:** Where risks are identified, the project team should develop an action plan to mitigate them.
- **Ensuring that all activities are conducted in ways that protect people from harm, abuse, or exploitation.** If the risks remain unacceptably high, the issue is escalated to country programme management for further review. Activities that have the potential to cause harm will not proceed.

6.2. Transparency and Fairness in Assistance:

PIN ensures fairness and transparency in how aid recipients are selected and how assistance is allocated. To maintain transparency:

- Aid recipients' selection criteria are clear and communicated to all stakeholders.
- No single staff member has the authority to decide on benefit allocation alone.
- All assistance is free of charge unless formal contributions are required.
- It is strictly prohibited for staff to solicit or accept bribes, gifts, or favors, including sexual favors.

6.3. Staff sensitization on ethical conduct and communication with aid recipients:

PIN is committed to providing all aid recipients and community members, especially those from marginalized and vulnerable groups, with clear, accessible, and inclusive information. This information is adapted to diverse needs through multiple formats, languages, and communication channels, considering literacy levels, abilities, and cultural contexts. This ensures that every population group can:

- Understand the assistance they are entitled to and the selection criteria.
- Be assured of the non-discriminatory and free nature of the aid (unless a formal financial contribution is required).
- Know the expected standards of conduct for PIN and its partners.
- Access the Community Feedback and Response Mechanism, ensuring open dialogue and continuous improvement.

6.4. Community Feedback and Response Mechanism (CFRM)¹³:

PIN provides an accessible, safe, and confidential CFRM that is inclusive of all aid recipients and community members, with particular attention to the needs of marginalized, vulnerable, and at-risk groups. The mechanism accommodates diverse needs by offering multiple reporting channels, such as in-person, digital, and anonymous options, ensuring accessibility for individuals with disabilities, language barriers, low literacy levels, and those in remote areas. PIN is committed to ensuring that all population groups understand how to use the CFRM safely, without fear of retaliation, and are informed about their rights to report concerns, including cases of abuse, discrimination, or misconduct.

In projects where the direct aid recipients are children—such as education, child-friendly spaces, and child development centers—PIN ensures the establishment and availability of a child-friendly CFRM. Every complaint is handled with the utmost confidentiality, and PIN ensures timely, sensitive, and effective responses to safeguard the safety, dignity, and well-being of all individuals involved.

¹³ For more information, see the [global CFRM policy](#) and [its annexes](#).

7. Roles and Responsibilities

Creating a safe working environment at PIN is everyone's responsibility and failure to act on concerns or disclosures relating to sexual harassment, abuse and exploitation, child abuse and other types of abuse will not be tolerated.

7.1. PIN Management and Country Directors:

The management holds overall accountability for the implementation and enforcement of the SG and PSEAH Policy, ensuring that safeguarding is systematically integrated into management strategies, planning, decision-making, and operational processes.

Country Directors provide leadership in ensuring safeguarding is prioritized and embedded across all programs and activities. They:

- Oversee the allocation of adequate resources to safeguarding at CPs.
- Ensure that HR, managers, and other relevant personnel are equipped to fulfill their responsibilities effectively.
- Ensure swift action in response to safeguarding violations, guaranteeing that all cases are managed in compliance with policy standards and principles.
- Ensure safeguarding remains a standard agenda item in management meetings and key internal reports (such as CP and regional reviews) to reinforce accountability and continuous monitoring.

7.2. PIN RDD Accountability and Safeguarding Unit

- The unit is managed by the Relief and Development Department (RDD) and may also provide on-request technical support to other PIN departments—such as the Human Rights Department, the Social Integration Program, and the Czech Programs Department—with a specific focus on safeguarding, including PSEAH and Child Safeguarding.
- The unit is responsible for reviewing and updating this policy in accordance with legislative, organizational, and donor requirements, ensuring alignment with best practices.
- The unit holds overall accountability for PIN's safeguarding work, including Child Safeguarding and PSEAH, and ensures compliance with donor requirements related to whistleblowing mechanisms, misconduct reporting obligations, audits, and other safeguarding measures.

7.3. All PIN Staff, Volunteers, Visitors, Partners, and Representatives

- Must adhere to the PIN Code of Conduct and Key policies including Safeguarding and PSEAH Policy, GESI Policy at all times, including outside of work hours.
- Are required to report any suspicions of SEAH, Child abuse and other types of abuse. This can be done confidentially, and failure to report such suspicions may result in disciplinary action.

7.4. Managers and Senior Management Teams

- Promote awareness of SG and PSEAH policy and PIN's GESI Policy within their divisions, departments, or teams.
- Ensure that safeguarding concerns are followed up promptly and in line with proper procedures.
- Collaborate with the HR team to ensure safe recruitment processes, particularly for positions involving contact with vulnerable groups, including children.
- Provide additional support to staff, volunteers, and representatives to assist in the implementation of the PIN SG and PSEAH Policy.

- Ensure that employees with specialized safeguarding responsibilities have the appropriate experience, training, resources, and support available, incorporating these into performance management.

7.5. Human Resources Team

- Ensure that all recruitment processes follow safeguarding guidelines, PIN GESI commitments and safe recruitment guide, especially for roles that may have direct or indirect contact with children or other vulnerable groups.
- Coordinate with Managers and Supervisors to provide capacity-building initiatives and safeguarding-related training

7.6. Safeguarding staff at CP level

The safeguarding roles (e.g., SG Manager, ProGESI/SG/CFRM Coordinator/Officer, Focal Point, etc.) within the country program are responsible for ensuring the safety, well-being, and protection of individuals, particularly vulnerable populations, by implementing and monitoring key policies on Safeguarding, Protection, and GESI. These positions work on, among other tasks:

- Raising awareness and training staff on safeguarding principles and procedures.
- Implementing reporting mechanisms and ensuring appropriate responses to incidents.
- Ensuring compliance with safeguarding standards through assessments, audits, and follow-up actions.
- Supporting victims and facilitating their access to protection and assistance services.

7.7. CFRM Staff

- Ensure that safeguarding and protection cases reported through the CFRM are processed according to the procedure outlined in the CP CFRM protocol and in accordance with the global categorization of complaints.
- Collaborate with safeguarding and protection staff to ensure appropriate and effective responses to reports.

8. Annex I. – Forms of unacceptable behaviour, terminology

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

8.1. Abuse

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

8.2. Bullying

Workplace bullying refers to repeated inappropriate behavior (verbal, physical, or otherwise) conducted by one or more individuals against another, undermining the individual’s dignity at work. While an isolated incident of such behavior may affront dignity, it does not constitute bullying unless it forms part of a

pattern. Legitimate management or employee rights and responsibilities, when exercised appropriately, are not considered bullying.

Bullying disproportionately impacts individuals who are marginalized or vulnerable due to factors such as gender, social status, disability, ethnicity, or other characteristics. It often reinforces existing power imbalances by targeting those with less privilege through exclusion, silencing, or harassment.

Bullying creates a toxic environment that erodes dignity, equality, and mental well-being. Proactively addressing these behaviors is crucial to fostering a respectful and inclusive workplace for all.

8.3. Examples of Bullying Behaviors:

- **Verbal or written abuse or insults:** Includes derogatory remarks about gender, appearance, roles, or abilities, perpetuating harmful norms and inequalities.
- **Exclusion and victimization:** Social exclusion or preventing participation in work-related activities.
- **Intrusion and intimidation:** Pestering, spying, stalking, or physical intimidation.
- **Menacing or aggressive behavior:** Such as unreasonable anger, shouting, or threats of abuse.
- **Humiliation and criticism:** Publicly criticizing someone's capabilities or personality, focusing on personal traits, or withholding constructive feedback.
- **Manipulation of work:** Overloading tasks, setting unachievable objectives, excessively monitoring work, or deliberately withholding work-related information.
- **Undermining reputation:** Spreading rumors, gossip, or ridicule to harm the victim's standing.
- **Reinforcing harmful stereotypes:** Behaviors that perpetuate traditional norms, particularly those affecting marginalized groups.
- **Child** means person under the age of eighteen (18) years as defined by the Convention on the Rights of the Child.

8.4. Child abuse

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

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

- **Physical abuse** is actual or likely physical injury to a child, such as hitting, kicking or shaking.
- **Emotional abuse** is harm done by persistent or severe emotional ill-treatment or rejection, such as degrading punishments, threats, bullying or not giving care and affection, resulting in adverse effects on the behaviour and emotional development of a child or young person.
- **Neglect** occurs when basic needs such as food, warmth and medical care are not met, resulting in the serious impairment of a child's or young person's health or development.
- **Sexual abuse** occurs if a child or young person is pressurised or forced to take part in any kind of sexual activity. A child cannot consent to any form of sexual activity. Sexual abuse includes incest, rape and fondling, showing pornography or viewing pornographic images of children. Sexual abuse may involve siblings or other family members, or persons outside the family.
- **Commercial or other exploitation** of a child refers to the use of the child in work or other activities for the benefit of others. *PIN observes the Convention on the Rights of the Child, which stipulates that children's work should not jeopardize any of their other rights, including the right to education, or the right to relaxation and play. At the same time, "state parties shall provide a minimum age or minimum ages for admission to employment". PIN Country Programs should therefore act in compliance with the Convention and relevant legislation in the given country.*

Child Grooming: Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them.

Children and young people who are groomed can be sexually abused, exploited or trafficked.

Anybody can be a groomer, no matter their age, gender or race. Grooming can take place over a short or long period of time – from weeks to years. Groomers may also build a relationship with the young person's family or friends to make them seem trustworthy or authoritative.

Child Safeguarding is the responsibility of organisations to ensure they do no harm to children. This means doing all they can to prevent exploitation and abuse, and if abuse occurs, to respond appropriately.

8.5. Conflict of interest

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

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

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

8.6. Corruption

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

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

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

8.7. Discrimination

Discrimination refers to the unequal or unjust treatment of individuals or groups based on personal or group characteristics such as gender, age, disability, appearance, ethnicity, religion, sexual orientation, socioeconomic status, and other socially constructed categories. It can manifest at both the individual level (through attitudes and behaviors) and the systemic level (through institutional policies and societal norms).

Discrimination reinforces social hierarchies and perpetuates inequalities, limiting marginalized groups' access to opportunities, resources, and rights that others take for granted. It may also occur through decisions or actions based on characteristics such as family status, marital status, citizenship, language, political conviction, caste, HIV and AIDS status, physical appearance, or lifestyle. *Nothing in this provision is intended to limit the ability of PIN to target activities toward the needs of certain target groups as defined in PIN goals and programs.*

Addressing discrimination requires recognizing and dismantling the systemic and social barriers that sustain inequality, while promoting inclusive practices to ensure fairness and equal access for all. Discrimination

can be overt, but there can also be more subtle forms that can cause equal harm to and affect negatively the individual, the community, the team and the organisation as a whole. PIN is committed to tackle also more subtle forms of discrimination, including stereotyping and stigmatisation. Subtle forms of discrimination can be, for example: questioning the judgment of a female employee because of her sex/gender; bringing up stereotypes in conversations or communications; excluding regularly certain employees from professional or social events, etc.

8.7.1. Examples of Discrimination:

- Programs that fail to address the distinct needs of women and men, leading to unequal benefits.
- Employment or service decisions based on religion, ethnicity, or other group identities.
- Stigmatization or denial of services to individuals with HIV/AIDS or other illnesses.
- Providing services exclusively to particular ethnic, religious, or political groups, thereby excluding others.

8.7.2. Discrimination against women

Discrimination against women is defined as any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.

Discrimination against women violates the principles of equality of rights and respect for human dignity, is an obstacle to the participation of women, on equal terms with men, in the political, social, economic and cultural life of their countries, hampers the growth of the prosperity of society and the family and makes more difficult the full development of the potentialities of women in the service of their countries and of humanity.

8.7.3. Racial discrimination

Racial discrimination means any distinction, exclusion, restriction or preference based on race, colour, descent, or national or ethnic origin which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise, on an equal footing, of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of public life²⁸. Manifestation of racial discrimination varies in different contexts.

8.8. Exploitation

Exploitation means using a position of authority, influence or control over resources, to pressure, force, coerce or manipulate someone to do something against his/her will or interest and wellbeing. This includes threatening to withhold project assistance, threatening to make false claims about a person in public, or any other negative repercussions in the workplace or community.

Examples of exploitation include, but are not limited to:

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

8.9. Fraud

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

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

8.10. Harassment

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

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

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

Many forms of behaviour may constitute harassment, including:

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

8.11. Trafficking in persons

Trafficking in persons means the recruitment, transportation (including failure to provide return transportation), transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

8.12. Intimidation

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

8.13. Modern Slavery

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

8.14. Sexism

Sexism is linked to beliefs around the fundamental nature of women and men and the roles they should play in society. Sexist assumptions about women and men, which manifest themselves as gender stereotypes, can rank one gender as superior to another. Such hierarchical thinking can be conscious and hostile, or it can be unconscious, manifesting itself as **unconscious bias**. Sexism can touch everyone, but women are particularly affected.

8.14.1. Sexual abuse

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

8.14.2. Sexual exploitation

Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

“Sexual exploitation” is a broad term, which includes a number of acts including “transactional sex”, “solicitation of transactional sex” and “exploitative relationship”.

8.14.3. Sexual harassment

- Sexual harassment refers to any form of verbal, non-verbal or physical conduct relating to sex which is unwanted by the person to whom it is directed and which has the purpose or effect of offending that person or creating an intimidating, hostile, offensive or disturbing environment. It includes a range of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to:
 - Physical conduct of a sexual nature, including unwanted contact such as unnecessary touching, patting or pinching or brushing against another person's body, assault and coercive sexual intercourse.
- Verbal conduct of a sexual nature. This may include sexual suggestions or demands, propositions or pressure for sexual activity, jokes, comments or messages of a sexual nature, continued suggestions for social activity outside the workplace after it has been made clear that such suggestions are unwelcome, unwanted or offensive flirtations, suggestive remarks, innuendos or lewd comments.
- Non-verbal conduct of a sexual nature. This may include the display of pornographic or sexually suggestive pictures, objects, written materials, posts on social media, emails or text messages. It may also include leering, whistling or making sexually suggestive gestures.

- Sex-based conduct. This may include conduct that denigrates or ridicules or is intimidating or physically abusive of an employee because of his or her sex, such as derogatory or degrading abuse or insults that are gender-related.

While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. The UN and other organisations use the term “sexual harassment” to describe misconduct among staff members. In order to capture all unwanted behaviour of sexual nature in one of the definitions and taking into account the points elaborated above, we choose to apply it in a broad sense. It hence includes, among others, the harassment of sexual nature of final beneficiaries.

8.14.4. Sexual Violence

Acts of a sexual nature against one or more persons or that cause such person or persons to engage in an act of a sexual nature by force, or by threat of force or coercion, such as that caused by fear of violence, duress, detention, psychological oppression or abuse of power, or by taking advantage of a coercive environment or such person's or persons' incapacity to give genuine consent. Forms of sexual violence include rape, attempted rape, forced prostitution, sexual exploitation and abuse, trafficking for the purpose of sexual exploitation, child pornography, child prostitution, sexual slavery, forced marriage, forced pregnancy, forced public nudity, forced virginity testing, etc.



PIN Gender Equality and Social Inclusion Policy

In case you have any feedback or suggestions concerning these guidelines, please send them to policy@peopleinneed.net

1. Introduction

Gender Equality and Social Inclusion (GESI) is an approach that promotes equitable access to resources, opportunities, and decision-making for all, addressing systemic barriers and power imbalances to ensure the full participation of marginalised and underrepresented groups in society. Unequal power relations, access to opportunities and full participation in processes (being these political, economic or societal) can be experienced by people on the grounds of gender, age, sexual orientation, racialisation, religion, caste/ethnicity, belonging to Indigenous Communities or minority groups, wealth, ability, location, language and agency or a combination of these dimensions (*Intersectionality*¹⁴). GESI focuses on the need for action to re-balance these power relations and inequalities, reduce disparities and ensure equal rights, opportunities, inclusion, full participation and respect for all individuals regardless of their social identity¹⁵.

The overall objective of **gender equality** is a society where everyone, regardless of gender identity, enjoys equal rights, dignity, and opportunities to reach their full potential. **Social inclusion**, crucial for achieving more just, inclusive and peaceful societies, involves removing barriers that prevent disadvantaged individuals from participating fully in society. This requires tackling discriminatory attitudes and creating conditions for equal access to resources, rights, and decision-making.

People in Need (PIN) is committed to “*Leaving no one behind*”¹⁶ by prioritizing the inclusion of vulnerable, marginalized, hard-to-reach and seldom-heard groups¹⁷ who often face discrimination based on gender identity, sexual orientation, ability, caste, ethnicity, religion, language, health condition or age¹⁸. **Gender Equality and Social Inclusion** are preconditions for the improvement of PIN interventions, as they are intrinsically linked to human rights, quality programming and sustainable development. PIN recognises that without the equal participation of all people, including individuals and population groups excluded or at risk of exclusion and discrimination, PIN’s actions not only are less likely to reach their full potential in terms of quality, effectiveness and sustainability, but also, they risk to perpetuate or consolidate dynamics of inequality and exclusion, causing harm to the communities and people we aim to serve.

Commitments stated in this policy align with international frameworks¹⁹ and should guide **all PIN activities**, thereby prevent negative effects caused as a result of our action, and work towards equality and inclusion. Through the implementation of this policy, PIN wishes to **contribute to global efforts to address gender inequalities and social exclusion** and in doing so, **support human rights and positive processes aimed at the creation of more equal, inclusive and peaceful communities and societies**.

PIN recognizes that GESI is a dynamic concept that could evolve over time. Therefore, this Policy shall be reviewed periodically and through inclusive and participatory processes to be able to respond appropriately to changing contexts, vulnerabilities and societies.

¹⁴ PIN recognises that Indigenous Peoples face intersecting forms of discrimination linked to ethnicity, cultural identity, and collective rights. PIN recognises their right to self-determination and their distinct development priorities. PIN commits to ensuring that the rights, dignity, and participation of Indigenous Peoples are respected and protected in all programming contexts. This includes respecting their cultural heritage, collective attachment to land and natural resources, and traditional institutions.

¹⁵ Social Inclusion Action Group, 2015, Towards More Inclusive Disaster Relief in Nepal.

¹⁶ To ‘*Leave no one behind*’ is the central principle of the SDGs. Also, one of the Core Humanitarian Standards sets as a target the “inclusive representation, participation and engagement of people and communities are ensured at all stages of the work” – <https://corehumanitarianstandard.org/>

¹⁷ Seldom-heard groups refers to under-represented people and people who are routinely excluded from participating in processes where they might contribute a constructive influence and/or change

¹⁸ A RES 70/1 General, 21 October 2015_Transforming our world_the 2030 Agenda for Sustainable Development.pdf, UN General Assembly; Resolution signed by the General Assembly on 25 September 2015.

¹⁹ e.g., CEDAW, SDGs, UN Women’s Principles

2. Applicability

2.1. This Policy is applicable for PIN RDD CZ and for PIN UK.

This version of the Policy was developed for specific use of Relief and Development Department (RDD). This Policy is applicable for all employees, other full-time and part-time workers of PIN, volunteers, interns, consultants or trainees, members of the Supervisory Board and the Board of Directors, and all other persons acting on behalf of PIN (hereinafter referred to as “associates”). This Policy is applicable also for PIN partner organisations in the frame of the partnership with PIN, unless they have their own Gender Equality and Social Inclusion (GESI) Policy containing all the key principles of this Policy.

3. Policy statement and objective

PIN believes that when we support and work towards gender equality and social inclusion, we work towards more inclusive, equal, just and peaceful societies.²⁰ This Policy aims to create a common understanding of the key steps required to become “GESI aware”, and to identify a pathway for GESI mainstreaming.

PIN is committed at both HQ and Country Programme levels to:

Integrating Gender Equality and Social Inclusion (GESI) by systematically adopting a human rights-based and mainstreaming approach, embedding GESI principles and actions into our organisational culture and working environment, communication, programming, and programme management.

- Fostering an inclusive and supportive work environment, ensuring equal opportunities for disadvantaged and marginalised groups in employment and career/professional growth.

4. PIN Core Principles and Commitments

PIN has developed a set of Core Principles and Commitments for the promotion and effective adoption of a GESI sensitive approach both at the HQ and Country Programme levels. To this end, PIN is committed to the following:

4.1. Promoting Gender Equality and Social Inclusion in PIN’s CULTURE and working environment

PIN shall strive to create and maintain a safe, supportive and inclusive working environment, where all genders and social groups enjoy equal inclusion, participation, and have equal/equitable opportunities, where gender biases are prevented and debunked and barriers addressed.

PIN has zero tolerance for any form of harassment, sexual violence, gender-based violence, exploitation, abuse, bullying, or misuse of power by staff, associates and/or partners, against any individuals based on gender, age, sexuality, disability, religion, or ethnicity²¹ and is committed to addressing both overt and subtle forms of discrimination²².

²⁰ Adapted from Integrity Action Gender Equality and Social Inclusion Strategy (GESI) Version 21 2016-2021
<https://integrityaction.org/media/4702/integrity-action-gesi-strategy-version-2.pdf>

²¹ In case you have encountered any form of discrimination, harassment, exploitation and/or abuse, report either through the local whistleblowing channels or to fraud@peopleinneed.cz, or report@peopleinneed.cz, or PSEA@peopleinneed.cz

²² Recognising systemic and structural inequalities, PIN acknowledges the historical factors that have created deep gaps in access to rights, opportunities, and growth for certain groups, such as women, non-binary identities, ethnic and cultural minorities, indigenous peoples, and persons with disabilities.

Adopt and commit to the rollout of this Policy, which institutionalises PIN's commitment to GESI and integrates its principles throughout the Organisation, ensuring they are integral to its operations, programming, and institutional framework

- Prevent and debunk gender biases and biases linked to belonging to socially vulnerable and excluded groups during recruitment process or promotion – PIN is committed to avoiding superficial assumptions about job roles and ideal candidates. Recruitment and promotion decisions are grounded in a thorough evaluation of the candidate's competencies and professional qualifications. Through its [HR Policy](#), PIN aims to foster a supportive and accountable environment, ensuring that all individuals are treated equitably throughout their engagement (hiring, employment, and termination)

For instance, women may have fewer years of professional experience than men of the same age due to time taken for maternity leave. In such cases, PIN focuses more on assessing the required competencies, practical skills, and the candidate's ability to deliver desired results, rather than relying solely on the formal number of years of work experience.

- **Prevent discrimination, harassment, exploitation and abuse** – PIN shall strengthen GESI awareness within the organisation to prevent discrimination and uphold the rights of all individuals, including disadvantaged and excluded groups. Discriminatory behaviour is not tolerated and is considered misconduct subject to disciplinary action²³. This includes (but is not limited to) racial, gender, and (dis)ability-based discrimination. Staff experiencing discrimination or any other form of abuse can use established mechanisms to share concerns safely and confidentially. All complaints are handled with care and confidentiality. Refer to the PIN [reporting mechanisms](#), whistleblowing, [CFRM](#) and Investigations process and guidelines. Also refer to the [PIN Code of Conduct](#) and [PIN Safeguarding and Prevention from Sexual Exploitation Abuse and Harassment \(PSEAH\) Policy](#) for more details on the standards of behaviour required by all PIN staff and clear definitions of forms of unacceptable behaviours.
- Ensure that all genders and social groups enjoy equal inclusion, participation, have equal/equitable opportunities and are not disadvantaged²⁴. PIN believes that diversity adds value to the teams and to the organisation. PIN embraces diversity in its workplace and works towards achieving it by bringing in a wider range of perspectives and experiences. PIN is committed to addressing barriers and creating a safe and supportive working environment tailored to staff needs, including work organisation, workspace design, communication, and capacity strengthening. This involves implementing affirmative actions and, to the greatest extent possible, reasonable accommodation²⁵. PIN may offer flexible working hours, such as adjusted start times or flexible schedules, particularly for staff with young children (under three years) or those with specific (dis)abilities.
- **Be an equal opportunity employer** – As an equal opportunity employer, PIN recognises that historical discrimination, disparities, and social exclusion affect access to opportunities. To address these inequalities and promote inclusion and equality, PIN shall implement need-based affirmative action²⁶ ("special measures") to ensure equal treatment in recruitment, compensation, advancement, and all aspects of the workplace. PIN is committed to fostering diverse leadership by creating an inclusive environment where all staff have equal access to leadership roles and the ability to influence decisions.

²³ Any form of exploitation or abuse of power is strictly prohibited, in line with PIN's commitment to human dignity and core values, including those set out in the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and the UN Convention on the Elimination of All Forms of Discrimination against Women. PIN's Code of Conduct (CoC) sets out clear expectations for employee behaviour, with breaches leading to disciplinary action up to and including dismissal. This is reinforced by Key Policies (KPs) such as: Anti-Corruption Policy, Safeguarding Policy, Protection from Sexual Exploitation and Abuse (PSEA) Policy, Whistleblowing Policy, Safety and Security Policy, Conflict of Interest Policy

²⁴ Recognizing systemic and structural inequalities, PIN acknowledges the historical factors that have created deep gaps in access to rights, opportunities, and growth for certain groups, such as women, non-binary identities, ethnic and cultural minorities, indigenous peoples, and persons with disabilities.

²⁵ In line with what stated in Art. 2 of the CRDPH – <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities.html> . Reasonable accommodation means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-2-definitions.html>

²⁶ Note that Affirmative Action measures must be in line with the principles and limitations laid by the applicable legislation.

While PIN does not apply affirmative action in leadership appointments, it actively promotes diversity through capacity strengthening, mentorship, and professional development initiatives. PIN is committed to ensuring disability inclusion in recruitment practices, ensuring equal access to employment opportunities for persons with disabilities. National staff policies shall be reviewed accordingly, applying a GESI lens, reflecting the commitments stated in this Policy.

- **Provide equal pay and benefits²⁷** – PIN ensures equal pay for women, men, diverse gender identities, and socially excluded groups for equal work under similar conditions, requiring equal skill, effort, and responsibility. Pay differences are based only on responsibility, seniority, and merit, assessed without bias.
- **Communication and Advocacy are GESI sensitive.** PIN shall ensure that all communication and advocacy efforts are GESI-sensitive, actively promoting inclusive, diverse, and equitable representation. PIN is committed to using language, imagery, and messaging that respect and amplify the voices of marginalised groups, challenge harmful stereotypes, and foster an environment of dignity, accessibility, and empowerment for all. PIN is also committed to promoting positive narratives on gender equality and social inclusion. Please see [PIN RDD Communications & Visibility Policy](#) and [PIN English Language & Style Guide](#) for more details.
- **Safety and Security: Risk Assessments and Country Security Management Plans are GESI sensitive.** Recognising that security risks vary across staff and supported populations based on gender, age, ability, and other factors, PIN shall integrate GESI considerations into risk assessments and security plans. Regular reviews of CSMPs will be conducted to uphold GESI sensitivity, promoting a safe and inclusive environment for both staff and the communities we support. Please refer to the [PIN Safety and Security Policy](#) for more information.
- **Develop Organisational Awareness, Culture and Capacity for Gender Equality and Social Inclusion.** PIN shall promote a shared commitment to GESI by ensuring all staff have the proper understanding, skills and support. PIN shall **internally train and raise awareness on GESI**. All PIN staff shall be oriented on PIN GESI policy as a mandatory and integral component of the staff induction process. PIN staff shall be trained in GESI mainstreaming, to ensure that all staff fully understand the benefits related to GESI integration and how PIN wish to contribute to it.

4.2. Promoting Gender Equality and Social Inclusion in PIN PROGRAMS

GESI is both a standalone objective and a crosscutting priority in PIN programs, forming a **core component of PIN's Safe, Inclusive, and Accountable (SIA) programming** approach. This approach ensures programmes are implemented safely, inclusively, and accountably, preventing harm while promoting gender equality and social inclusion. PIN shall **integrate GESI as a crosscutting issue and an objective in programmes and projects cycles** by embedding GESI specific considerations and requirements at every stage, allocating **GESI Focal Points (ProGESI FPs)** with appropriate budgeting, and utilising GESI indicators to measure progress and impact. **GESI mainstreaming guidelines (Annex II)** will support staff in designing and implementing GESI-sensitive projects and advocacy. PIN will fulfil these commitments by:

- **Safe, Inclusive and Accountable (SIA) Programming.** PIN is committed to delivering assistance that does good while avoiding harm. Through SIA Programming, PIN integrates **Protection, and Gender Equality and Social Inclusion (ProGESI), Conflict Sensitivity (CS), Do No Harm (DNH), Safeguarding (SG)** across program cycles. By embedding SIA principles in its interventions, PIN strengthens them, aligning with human rights principles, quality standards, and sustainable development. PIN is committed to identifying, assessing, and mitigating SIA risks in its programming. At the project level, regular social and environmental risks assessments are conducted using the PIN's tools for social and environmental screening and risk analysis to ensure ongoing monitoring and mitigation of risks²⁸.

²⁷ This is done in relation to the local job markets.

²⁸ Where Indigenous Peoples are present, social and environmental screening and risk analysis will explicitly analyse potential impacts on their land, livelihoods, and cultural heritage. Risks and mitigation measures will be documented using PIN's social and environmental screening and risk analysis tools, and, where required, through an Indigenous Peoples Plan (IPP) or Indigenous Peoples Framework (IPF)

Project workplans integrate identified risks and mitigation measures are incorporated into project design to ensure that implementation upholds the dignity, safety and well-being of all stakeholders. When necessary, adjustments to project components or budgets are proposed to donors to maintain relevance, feasibility and to ensure DNH.

- **Training and Capacity Strengthening** – PIN staff shall be trained in **GESI mainstreaming and in Safe, Inclusive and Accountable Programming (SIA)**, to ensure that all staff, regardless the gender, disability and social, religious, ethnicity, etc. belonging, fully understand the benefits that GESI bring to them as individuals and, more broadly, as members of communities and societies. Exchanges of best practices and lessons learned shall also be encouraged, e.g. via PIN social network, communities of practice, Technical Advisors' visits, etc.
- **Assessments, Analyses and Data Collection are GESI sensitive.** GESI Analyses and/or GESI sensitive assessments are conducted for all programs, projects, and Country Programme strategies²⁹, engaging diverse stakeholders through participatory methods and using findings to guide partnerships, design, and implementation. PIN ensures its programs are informed by **GESI and Vulnerability analyses** to understand and address factors influencing **gendered risks, inequality and exclusion**³⁰. This helps define clear, **GESI-sensitive** actions for risk prevention, mitigation and response.
- **Project Design:** PIN shall ensure equal participation of all genders, persons with disabilities, and socially excluded groups in project planning. Interventions, services, and products will be designed for equitable access, use and benefit by involving all groups to identify users and their specific needs (e.g. ensuring safe access to a new water source).
 - **Address specific barriers, needs and capacities of different population groups.** PIN is committed to inclusive development and humanitarian action, addressing the barriers, needs, and capacities of diverse groups and removing structural barriers, fostering meaningful participation. Through engagement with affected communities, PIN ensures that different groups not only receive support but also play a key role in shaping interventions that affect them. PIN's approach aligns with the Core Humanitarian Standard (CHS), which emphasises accountability to affected populations, protection from harm, and meaningful participation of communities in humanitarian action. By endorsing the Charter on Inclusion of Persons with Disabilities in Humanitarian Action³¹, PIN ensures persons with disabilities can access relief, protection, and recovery support and actively participate in planning and implementing humanitarian programs.
 - **Resources Allocation** – Budget and human resources are allocated to meet GESI mainstreaming requirements, including for Referrals, capacity strengthening and ProGESI Focal Points³² at the project/Country Programme level. Early budgeting for GESI ensures efficient resource use, effective programming, and mitigation of potential harm or unintended consequences.
- **Project Implementation.** PIN is committed to ensure the equal and meaningful participation of all genders, persons with disabilities, and socially excluded groups in decision-making and project activities. Inclusive measures, such as diverse representation in teams, advisory boards, and events, are integrated into all programs. PIN proactively engages communities in identifying and addressing barriers to participation³³. Moreover, PIN regularly consults communities and stakeholders in designing accessible and confidential complaint and feedback mechanisms (CFRM), ensuring that referral pathways are operational, integrated within the CFRM, and aligned with PIN's Referrals and Safeguarding Procedures. Entry points for feedback are co-designed with diverse social groups to

²⁹ The CP strategy describes how the Gender Equality and Social Inclusion considerations should be incorporated into programme design and implementation.

³⁰ Staff should refer to [PIN's Gender Analysis Guide](#) to get familiar with basic concepts of gender mainstreaming, and for practical guidance and tools for gender analysis.

³¹ The Charter established five actionable commitments: non-discrimination; participation; inclusive policies; inclusive responses and services; and cooperation and coordination and is committed to address the barriers faced by people discriminated against on the grounds of disability, gender, age, ethnicity, etc. to ensure equal and meaningful access to services. <http://humanitariandisabilitycharter.org/>.

³² For clarity and alignment, GESI responsibilities should be integrated into the ProGESI FP Job Description (JD) and Terms of Reference (ToR). Please refer to this [document](#) for a detailed breakdown of responsibilities for each FP scenario.

³³ This includes (but is not limited to) consulting diverse groups on safe locations for distributions, identifying accessible venues, adapted communication methods, and mobility support for persons with disabilities, culturally acceptable engagement strategies and appropriate timing of activities to prevent risk exposure. Where feasible, childcare, transportation support are provided to enhance participation without reinforcing stereotypes.

enhance accessibility and inclusivity, in compliance with the [PIN CFRM Policy](#)³⁴. Key **SIA Programming themes** are systematically monitored and integrated into project implementation. Regular assessments³⁵ ensure that these themes remain central, with corrective measures taken as needed to uphold inclusivity and accountability, mitigating risks and ensuring no harm is caused as a result of the intervention. This includes safeguarding mechanisms to prevent exploitation, abuse, and discrimination in programming.

- **GESI in Monitoring, Evaluation, Learning and Reporting.** PIN integrates GESI in Monitoring, Evaluation, and Reporting by embedding GESI considerations into tools, documenting successes, challenges, and lessons learned, and including dedicated targeted outcomes and indicators³⁶. Data is systematically disaggregated by gender, age, disability, ethnicity, and other relevant factors to support evidence-based decision-making. GESI indicators, including those available on [PIN's IndiKit](#), are developed, tracked, and regularly collected, analysed, shared, and applied to measure progress effectively.
- **Partners. GESI considerations are embedded in PIN Partner Assessment Tool (PAT)** to ensure a GESI-sensitive approach to partnerships³⁷. PIN shall seek to collaborate with local actors who have vision, sensitivity, or are able to have a significant impact upon social inclusion, non-discrimination, and gender equality. This includes governments, civil society, the private sector, and key influencers. PIN shall work with and support local partners to advance Gender Equality and Social Inclusion, ensuring ownership and sustainability. Additionally, PIN shall assist partners strengthen their existing GESI policies or develop new ones aligned with the key principles of this Policy.
- **Communication and Advocacy are GESI sensitive.** PIN shall ensure that communication with affected populations is GESI-sensitive by recognizing and addressing differences in information access, generation, and dissemination across diverse groups. This includes considering language, literacy levels, abilities, and preferred communication channels based on their locations and interaction patterns. PIN will strategically tailor communication methods to ensure inclusivity, using appropriate and accessible tools that effectively reach and engage all population groups. Please see [PIN RDD Communications & Visibility Policy](#) for more details. PIN will integrate GESI as a crosscutting topic and objective in its **advocacy efforts**, aiming to empower socially vulnerable and excluded groups.

5. Roles and Responsibilities

Responsibility of all – To appropriately mainstream Gender Equality and Social Inclusion and adopt a GESI-sensitive approach requires a commitment of **all team members** and a proactive approach by **senior management**.

- **All PIN staff Volunteers, Visitors, Partners, and Representatives** are responsible for conducting themselves in such a manner that is compliant with this policy.
- **Managers and Senior Management Teams** will ensure enough **resources** are allocated to ensure that measures outlined in this policy can be effectively followed both in internal operations and programming
 - **Line managers** are responsible for integrating the principles of this policy into the work of their teams and into relevant job descriptions and the **operationalisation of the GESI Policy provisions**

³⁴ PIN's CFRM shall be culturally appropriate and accessible to Indigenous Peoples. FPIC (Free, Prior and Informed Consent)-related concerns or grievances will be managed transparently and respectfully recognizing traditional dispute resolution mechanisms while ensuring consistency with human rights principles.

³⁵ PIN social and environmental screening and risk analysis, and SIA sensitive assessments

³⁶ Monitoring and evaluation processes use participatory method and are inclusive of the perspectives of socially excluded and marginalised groups.

³⁷ Where projects may affect Indigenous Peoples, partner assessments will verify partners' capacity to implement Indigenous Peoples safeguards, including FPIC processes, culturally appropriate consultation, and benefit-sharing.

- **Human Resources Team** ensure that all recruitment processes follow this Policy's provisions and commitments
- **RDD Programme Strategy and Impact Department** is responsible for **technical support** in integrating the principles of this policy into our work and providing **expertise**. PIN ensures that such expertise either exists in the organisation or is available externally.



PIN Anticorruption Policy

In case you have any feedback or suggestions concerning these guidelines, please send them to policy@peopleinneed.net

1. Introduction

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

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

2. Terminology

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

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

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

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

Extortion – an unlawful use of one’s position or office to obtain money through coercion or threats.

Excessive gifts and hospitality – gifts and hospitality can range from small gifts (such as diaries) to expensive hospitality (tickets for major events, holidays etc.). Extravagant gifts and hospitality may disguise bribes that are intended to induce corrupt behaviour³⁸.

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

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

3. Standards of conduct in relation to corruption

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

³⁸ As stated in the PIN Conflict of Interest Policy, PIN defines excessive gifts and hospitality “accepting donations or other forms of benefits in value exceeding 1000 CZK (50 USD or 40 EUR)”.

Corruption in any form, whether direct or indirect, as defined above, is forbidden. If encountering bribery, the response to all cases should be to reject the demands. Corrupt behaviour through or for the profit of a third party (friends and relatives, partner organization, etc.) is also forbidden.

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

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

4. PIN commitments

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

- PIN management actively promotes the message of “zero tolerance towards corruption” and maintains relevant internal procedures and controlling mechanisms to ensure that PIN staff and associates adhere the principles of this Policy.
- This Policy is disseminated through effective internal and external communication channels and relevant practical training provided to all PIN staff and associates.
- This Policy creates an inseparable part of all relevant contractual relationships. Disciplinary or contractual sanctions are applied for the violation of this Policy up to the possible termination of the contract.
- It is clearly communicated that no PIN staff or associate will be disadvantaged when he/she refuses to pay bribes or engage in any other form of corrupt behaviour.
- All PIN staff and associates are obliged to report any form of corrupt behaviour (including attempted bribes) and any violation or concerns related to this Policy as early as possible. For this purpose, secure, accessible and trustworthy channels of information must be maintained, particularly through the PIN [Whistleblowing Policy](#).
- All acts of corrupt behaviour (including attempted bribes) are duly recorded and properly and promptly investigated.
- Partner organizations are appropriately evaluated regarding the adherence to the anticorruption principles prior the commencement of the first joint activities.
- Toward its beneficiaries, PIN communicates to the maximum extent possible that corruption is forbidden within PIN ranks. All promotional materials related to free PIN support and services should contain the following sentences:

“All goods and services provided by PIN within this project are free of charge. Should a payment or any other compensation be requested in exchange of these goods or services, a senior PIN representative must be informed immediately.”

- Final beneficiaries' selection is based on the transparent set of criteria and PIN staff must ensure that these criteria are observed and that the selection process is free of corruptive practices.

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

Further this applies to other agreements if such confirmation should be required considering the circumstances.

The following sentence is added to all above specified contracts:

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

- In relation to the Human Resources (HR), PIN management at all levels is responsible for setting up regulations minimizing the risks of corruption, internal nepotism and other forms of possible misuse. This refers mainly to the hiring procedures which should be transparent and based upon the CV, interview, at least two references and relevant testing. Different procedures must be clearly justified.
- PIN management ensures that the control mechanisms regularly monitoring the adherence to the above stated principles are in place and that they are periodically updated and reviewed in line with the existing and applicable legislation³⁹.

5. Annex I.

5.1. List of potential indicators of bribery and corruption

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

- Abnormal cash payments
- Pressure exerted for payments to be made urgently or ahead of schedule
- Payments being made through 3rd party country (e.g. goods or services supplied

to country ‘A’ but payment is being made, usually to shell company in country ‘B’)

- Abnormally high commission percentage being paid to a particular agency. This may be split into two accounts for the same agent, often in different jurisdictions
- Private meetings with public contractors or companies hoping to tender for contracts
- Lavish gifts being received
- Individual never takes time off even if ill, or holidays, or insists on dealing with specific contractors him/herself
- Making unexpected or illogical decisions accepting projects or contracts
- Unusually smooth process of cases where the individual does not have the expected level of knowledge or expertise
- Abusing decision process or delegated powers in specific cases
- Agreeing contracts not favourable to the organization either with terms or time period

³⁹ See the recommended guiding principles for the NGO policies at RESIST (Resisting Extortion and Solicitation in International Transaction), Transparency International, March 21, 2011.

- Unexplained preference for certain contractors during tendering period
- Avoidance of independent checks on tendering or contracting processes
- Raising barriers around specific roles or departments which are key in the tendering/contracting process
- Bypassing normal tendering/contractors procedures
- Invoices being agreed in excess of contract without reasonable cause
- Missing documents or records regarding meetings or decisions
- Company procedures or guidelines not being followed
- The payment of, or making funds available for, high value expenses or school fees etc. on behalf of others.
- Unusual and/or disproportionate delays from government authorities for otherwise clearly defined procedures – expectation of bribe is likely

Source: Serious Fraud Office



PIN Conflict of Interest Policy

In case you have any feedback or suggestions concerning these guidelines, please send them to policy@peopleinneed.net

1. Introduction

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

2. Terminology

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

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

3. Standards of conduct in relation to conflict of interest

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

3.1. Conduct forbidden to PIN staff and associates

- Public political or religious activity in which PIN is used as a means of political/religious propaganda
- Participation in activities or membership in organizations, alliances and associations whose focus is in major conflict with the activities, values or good reputation of PIN
- External employment or other forms of activity outside PIN which is in contradiction to the activities, values or good reputation of PIN
- Accepting donations or other forms of benefits in value exceeding 1000 CZK (50 USD or 40 EUR) from partner organizations or business partners of PIN and keeping these for personal use
- Use of confidential information obtained under the working relation with PIN for personal benefit or for the benefit of third persons
- Use of function within PIN or referencing to the function for the purpose of personal benefit
Preferring members of her/his own family if these are employees of PIN
- Entering sexual relationship with PIN beneficiaries

3.2. Forms of conduct or situations which need to be consulted

- Carrying out business activities in areas of PIN operation
- Intimate personal relationships with beneficiaries of PIN assistance or representatives of organizations which are in business relation with PIN
- Membership with organizations, management boards or evaluation committees of donor institutions from who PIN is attempting to apply for funding
- Participation in managing or control bodies of partner organizations
- Employing own family members
- Ownership, shareholding or membership in a company or business which has a business relationship with PIN (this point applies to family members or close relatives of PIN employees)

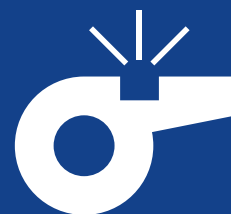
- Paid activity (lecturing, training, public speaking) during working hours of the PIN staff member resulting in income exceeding 3000 CZK (150 USD or 120 EUR) / month

4. Procedures for resolving conflict of interests

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

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

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



PIN Whistleblowing Policy

In case you have any feedback or suggestions concerning these guidelines, please send them to policy@peopleinneed.cz

Name of regulation	Whistleblowing Policy
This regulation relates to (name of primary regulation)	Code of Conduct of People in Need
Scope of applicability (e.g. all employees, name of section, ...)	All employees/associates
Approved – by whom	Executive Board
Approved – when	7 October 2024
Name of responsible person	Anna Soumarová, HR and Operations Director
Language versions	CZ, ENG
Version number of the regulation and effective date	V2_2024, effective as of 1 November 2024
Description of changes compared to the previous version	Complete revision in line with revision of the <i>Code</i> – uniform for the entire organisation

1. Whistleblowing and the *Code of Conduct*

The *Code of Conduct (Code)* defines the expected standards of conduct and is binding for all employees, other full-time and part-time workers, volunteers, interns, consultants or trainees, members of the Supervisory Board and Board of Directors and all other persons acting on behalf of People in Need (hereinafter referred to as PIN), hereinafter referred to as “**associates**”. The *Code* is also binding for associates working with PIN’s sister organisation, People in Need UK, which is based in the United Kingdom of Great Britain and Northern Ireland.

This Whistleblowing Policy forms an integral part of the *PIN Code of Conduct* and aims to:

- determine the level of severity of breach of the Code (complaints versus whistleblowing),
- explain the differences between the method of reporting a breach of the Code in the Czech Republic and abroad,
- explain the differences between reporting by a PIN associate and reporting by third parties (whether beneficiaries or others),
- set out the rules for reporting and explain what happens after a report has been submitted and what the implications may be,
- ensure that persons against whom a report has been submitted have the opportunity to familiarise themselves with and comment on the report, including presentation of the relevant evidence,
- ensure the presumption of innocence of persons against whom a report has been submitted, pending proper investigation of the complaint.

2. Who Submits a Report?

- **PIN associates** report conduct which is at variance with the purpose of the *Code*. Major breaches of the *Code* (as defined in this Policy) must be reported at all times and under all circumstances, and failure to report them shall in itself be deemed to be a violation of the Code.
- The whistleblower may also be a third party who has become aware of conduct in breach of the Code in connection with work or other similar activities for PIN (e.g. a partner organisation, or supplier, etc.), a client or a recipient of aid, whether in the Czech Republic or abroad.
- The report must be based on **verifiable facts**.

3. Who Can Breaches of the *Code* Be Reported to?

The distinguishing criteria for reporting breaches of the *Code* are:

3.1. severity of breach of the *Code*

- minor (complaints)
- major (whistleblowing)

3.2. subjects of reporting (i.e. who submitted the report against whom)

- within the organisation among PIN associates,
- a person other than an associate and a recipient of aid reporting a PIN associate (e.g., a partner organisation),
- a person outside the organisation reporting a PIN associate.

Breach of the Code = procedure according to the severity of breach of the Code		To Whom
MINOR (complaints)	in particular, expressing dissatisfaction with something specific in the workplace, e.g. the working environment, department/branch/section management, work standards, work tasks and duties, conflict with a colleague (problems in labor relations, staffing issues. etc.)	In the Czech Republic and abroad: line manager or another supervisor according to the organizational chart or the HR Department
MAJOR (whistleblowing)	discrimination, harassment, intimidation and bullying abuse of position and power causing any harm to children. sexual or other abuse of persons, violation of laws and support for criminal activity, corruption. conflict of interest, damage to property, including misuse of funds and misuse of information	In the Czech Republic: internal reporting system On country program mission: the person designated for this purpose or the internal reporting system

4. Procedure for Reporting Breach of the Code

4.1. Reporting of minor breaches of the Code (complaints)

Reports of minor breaches often relate to the **working environment** and are preferably reported to the line manager of the person who is alleged to be guilty of unacceptable conduct (alleged breach of the Code). Reports can only be submitted verbally or by email. If reasonable suspicion exists that the line manager will not investigate and resolve the complaint, or if the whistleblower is unwilling, afraid or uncomfortable addressing the issue with their line manager, the whistleblower moves on to the next supervisor higher up in the organisational chart.

If it is determined that the breach is not a minor breach of the Code but a major breach, the supervisor (line manager) or the HR Officer is obliged to first consult the designated focal point⁴⁰ with regard to the case or proceed directly in line with section 4.2.

4.2. Reporting major breaches of the Code (whistleblowing)

Reports which indicate a possible violation of laws with a negative impact on individuals, public health and safety, or the property of the organisation, and **therefore constituting a major breach of the Code**, can be reported via the **internal reporting system (IRS)** to the **designated focal point** as follows:

- **in writing** to People in Need, addressed to the **designated focal points at HQ**, Šafaříkova 24, 120 00 Prague 2 (can be sent by post or handed over in person at reception at this address), please mark the envelope “Do not open – FAO the addressee only”,
- **by phone**
 - **Competent Person 1:** +420 775 894 935
 - **Competent Person 2:** +420 734 742 982,

⁴⁰ Designated focal point: People in Need is required to have such a person under the Whistleblower Protection Act (WPA), he or she is appointed by the Director, must be of good character (according to the WPA), and performs the activities entrusted to him or her by the Act and this Policy. This in particular concerns meeting of obligations in relation to taking receipt of and assessing the justification for reports received, investigating them and, where appropriate, proposing corrective measures.

- **by email:** whistleblowing@clovekvtisni.cz⁴¹,
- **in person:** by prior arrangement, by telephone or by email, it is possible to arrange a date for a face-to-face meeting, no later than within 14 days of the date on which the whistleblower requests it.

Reports can be submitted via the *IRS* in any language. If the report is made verbally or by phone, the designated focal point will draw up a written record which faithfully captures the nature of the report and allows the person who submitted it to comment on this record. With the prior consent of the whistleblower, an audio recording may be made.

The *IRS* is available on the PIN website <https://www.clovekvtisni.cz/vnitri-oznamovaci-system-7s>.

4.3. Reporting in accordance with the Whistleblower Protection Act (*WPA*)

Whistleblowers are also entitled to submit reports via the *IRS* in accordance with Act No. 171/2023 Coll. on the Protection of Whistleblowers (*WPA*) regarding possible illegal conduct⁴² exhibiting the characteristics of a criminal offence, a misdemeanour or which otherwise violates the *WPA* or legislation of the European Union, which the whistleblower has become aware of in connection with work or other similar activity⁴³. In the event of reporting in accordance with the *WPA*, only a natural person may submit a report and should do so while acting in the public interest and in good faith that the report is based on credible facts and evidence.

In the case of reporting in accordance with the *WPA*, this is deemed to concern **reporting of a major breach of the Code**.

4.4. Procedure for reporting major breaches of the Code on a PIN mission abroad

Reporting of a major breach of the Code on PIN missions abroad may be submitted as follows:

- via the *IRS*, or
- to the **designated focal point at the concerned mission**, or
- by any other means designed for submission of such reports, if established on the mission and if PIN associates have been sufficiently familiarised with it.

⁴¹ Emails sent to the addresses used so far fraud@peopleinneed.cz (email for reporting suspected fraud, theft or embezzlement), psea@peopleinneed.cz (email for reports concerning the protection of children and disadvantaged persons) and report@peopleinneed.cz (a tool for reporting serious complaints if no other mechanism is used) will be automatically redirected to the email

⁴² **Areas which the reported illegal conduct must relate to:**

1. public procurement;
2. financial services, products and markets and the prevention of money laundering and financing of terrorism;
3. product safety and regulatory compliance;
4. transport safety;
5. environmental protection;
6. radiation protection and nuclear safety;
7. food and feed safety, animal health and welfare;
8. public health;
9. consumer protection and
10. privacy and personal data protection and security of networks and information systems.

⁴³ **Work or other similar activity is understood to mean:**

1. employment,
2. service provision,
3. self-employment,
4. exercising of rights associated with participation in a legal entity,
5. discharge of office as a member of a body of a legal person who is elected, appointed or otherwise called to office (an "elected body"),
6. administration of a trust fund,
7. volunteering,
8. work experience, internship, or
9. exercising of rights and obligations arising from a contract, the subject of which is provision of deliveries, services, construction work or other similar performance.

Investigation of reports submitted on a PIN mission abroad has its own specifics, as it is always necessary to take into account not only the *WPA*, but **also the local legislation** and cultural or other differences. This is why cooperation between competent and designated persons is important.

If a report of a major violation of the *Code* is submitted to the designated person on a foreign mission, the **designated person will always inform the competent person of this fact** and they will agree on the next steps in the investigation of the report. Compliance with this obligation is also important from the point of view of any possible obligation to inform institutional donors.

5. Complaints by Recipients of Aid Directed Against PIN Associates

Beneficiaries may express **dissatisfaction with the PIN's handling** of their application. They may, but are not required to, provide the specific name of the associate. In view of the fact that such cases may involve an expression of dissatisfaction with the outcome of an application and, therefore, not necessarily a breach of the *Code*, separate mechanisms are in place for this type of reporting:

5.1. Procedure for handling of complaints and submission of feedback abroad (CFRM)

Any **beneficiary or other party involved in PIN projects abroad** may submit a report or provide feedback in accordance with the procedure set out in section 4.4, i.e.:

- via the *IRS*, or
- **to the** designated focal point at the concerned mission **or**
- **by any other means** designed for submission of such reports, if established on the mission and if PIN associates have been sufficiently familiarised with it.

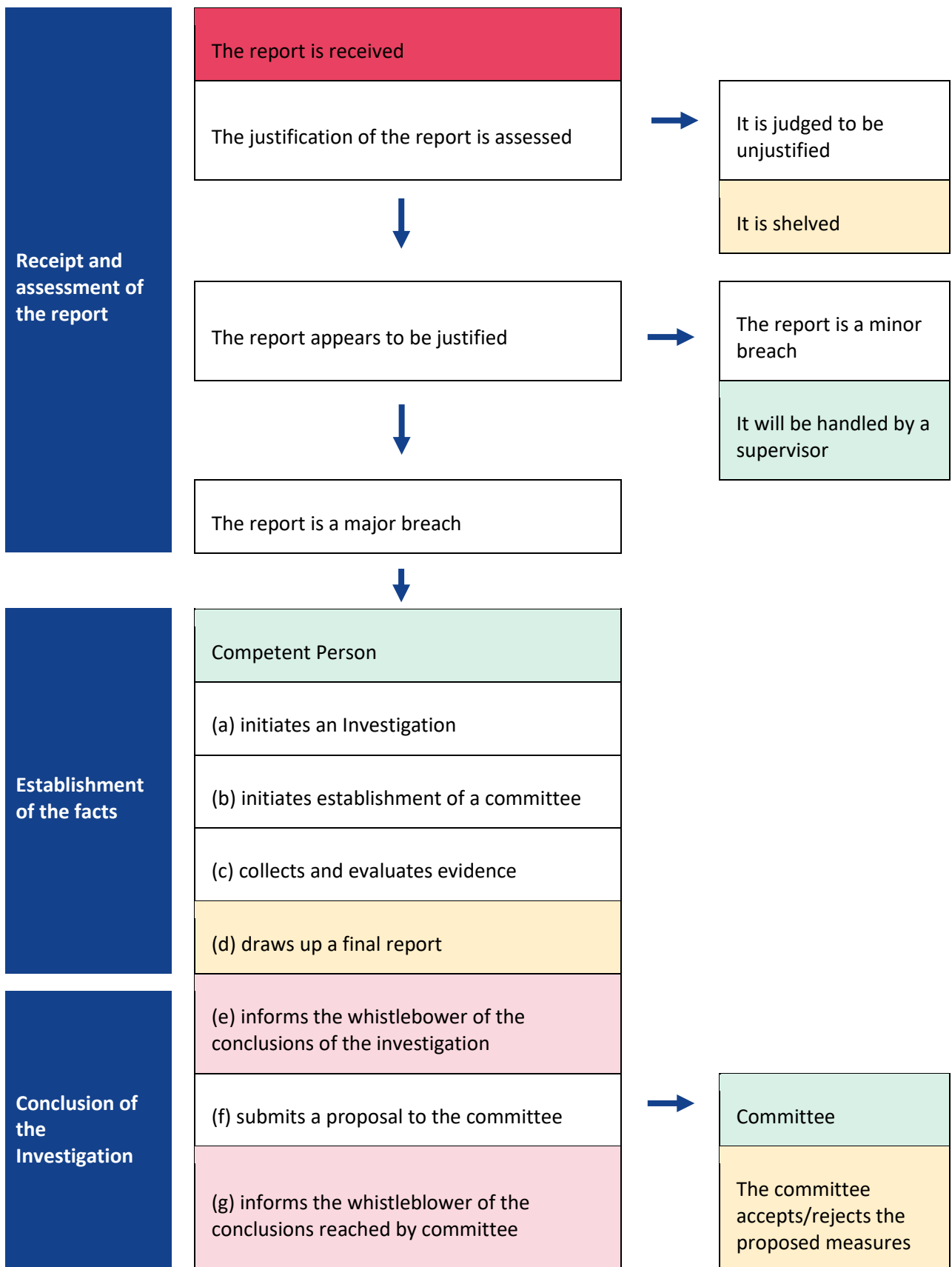
These reports will be dealt with in accordance with the ***Policy for handling of complaints and submission of feedback abroad (CFRM)***, which provides a safe, simple and effective way to submit a complaint, provide feedback and seek remedy. Stored in ELO [here](#).

6. What Should the Report Look Like?

It is possible to submit a report anonymously, but such a report may be difficult to investigate. In order for the report to be investigated quickly and professionally enough, it is recommended that a description be provided as outlined below:

- **What** has happened/what could happen?
- **Who** was guilty of the conduct in question?
- **When, where and how** did the reported conduct occur?
- Has there been any **physical or psychological injury**? Has there been any **damage to property**?
- Is there any **evidence** (documents or witnesses) to prove what happened?

7. What Happens After Breach of the Code Is Reported?



- 7.1.** In cases of minor breaches of the *Code*, supervisors are responsible for due handling of complaints or persons designated to do so in the case of a country program mission; if such a person has been designated to take receipt of reports, see section 4.4.
- 7.2.** Reports of **major breaches of the Code** are always investigated by the designated focal point . The designated focal point provides the whistleblower confirmation of receipt of the report **without undue delay, although within 7 days at the latest**. This obligation does not apply where the whistleblower has expressly requested not to be notified of receipt of the report or where it is clear that notification of receipt of the report would lead to disclosure of the identity of the whistleblower to another person or if this concerns an anonymous report.
- 7.3.** The competent person assesses whether they have sufficient information to decide on the next course of action.
- If **there are sufficient relevant facts** for an initial assessment and decision that there is no indication of any breach of the *Code*, the report may be
 - Suspended , or
 - **forwarded** in accordance with section 4.1 (i.e. to the line manager or head of the relevant department/section), particularly where there is any justified dissatisfaction which can be resolved by a simple management decision.
 - In the **absence of relevant facts**, the so-called “**fact-finding stage**” is initiated to ascertain any other available facts.
- 7.4.** If other facts found indicate that **there has not been a major breach of the Code**, but only a minor breach, the competent person proceeds in accordance with section 4.1, forwarding the report either to the line manager of the person regarding whom the report was submitted, or to the next supervisor of the whistleblower higher up in the organizational chart.
- 7.5.** If further facts which are ascertained confirm that **a major breach of the Code has occurred**, the designated focal point initiates the appointment of a **committee** with two to three members. The committee is responsible for overseeing the internal investigation and making the final decision in accordance with section 7.10.
- 7.6.** The committee **is appointed by the** line manager of the person regarding whom the report was submitted, provided that there is no conflict of interest and that their impartiality is ensured; otherwise, the committee is appointed by the next superior higher up in the organisational chart. In the case of a report submitted to the director, the committee is appointed by the Chairman of the Board or, in his absence, by any member of the board.
- 7.7.** If a report is submitted with regard to an associate from another section, the committee will **be composed** of representatives of the sections affected by the report. **Each section** will be represented on the committee by at least one member. If more than three sections are affected by the report, the number of committee members will be increased according to the number of sections affected.
- 7.8.** The competent person **must not** provide the committee with information that could frustrate or undermine the purpose of the report that **has been submitted**. Information about the identity of the whistleblower and persons concerned⁴⁴ may be disclosed only with their written consent.⁴⁵

⁴⁴ (Section 4(2))

- a. a person who has provided assistance in ascertaining the information contained in the report, filing the report or assessing its justification,
- b. a person who is a closely related person of the whistleblower,
- c. a person who is an employee or colleague of the whistleblower,
- d. a person controlled by the whistleblower,
- e. a legal entity in which the whistleblower has an interest, a person controlling it, a person controlled by it or a person controlled by the same controlling party as the legal entity,
- f. a legal entity of which the whistleblower is a member of an elected body, a controlling party, a controlled party or a party controlled by the same controlling party,
- g. a person for whom the whistleblower performs work or other similar activity, or
- h. a trust fund of which the whistleblower or a legal entity referred to in point (e) or (f) is a founder or a recipient, or in relation to which the whistleblower or a legal entity referred to in point (e) or (f) is a party who substantially increases the assets of the trust fund by means of a contract or by acquisition on death

⁴⁵ The competent person assesses whether it is necessary to know the identity of the whistleblower in order to investigate the report. If so, the competent person will contact the whistleblower and seek his or her written consent to disclose the information to the committee. If consent is given, a committee is appointed. If consent is not given, only the competent person may conduct the investigation.

- 7.9. The competent person then **collects further evidence**, particularly documentary evidence, and takes participant and witness statements. On the basis of the evidence gathered, the competent person then prepares a **final report** containing findings, analysis and a proposal for measures to prevent or remedy the illegal state of affairs.
- 7.10. The competent person then submits a final report with a proposal for action to the committee, which determines the further course of action.

8. What Will the Result of the Internal Investigation Be?

The result of investigation into a breach of the *Code* is:

8.1. Assessment that the report is unjustified (there was no breach of the *Code*) or unsubstantiated (sufficient evidence cannot be provided):

- The person who took receipt of the report informs the whistleblower that there has been no breach of the *Code* or that the facts set out in the report were not confirmed, and the report will be **shelved**.

8.2. Assessment that the report is justified and substantiated and that the *Code* has been breached:

- A **minor breach of the *Code*** may, for example, result in a reprimand, a reduction in remuneration, termination of the contractual relationship in accordance with the [Principles of Disciplinary Procedure](#), with the rules relating to a relationship other than employment, or in accordance with another contract. **Decisions on the specific measure shall be made by the line manager or other superior** according to the organisational chart. For minor complaints, **verbal feedback** may be sufficient, if the context so allows and if this is sufficient with regard to all of the circumstances. How these reports (complaints) are dealt with will depend on their severity, complexity and sensitivity. However, both the whistleblower and the person against whom the complaint was made will always be interviewed; both interviews will usually be conducted by the supervisor or person designated to do so by him or her.
- The consequence of a **major breach of the *Code*** will be that the competent person informs the whistleblower of the justification of the report and proposes to the committee measures to prevent or remedy the illegal state of affairs. **Responsibility for making a decision regarding the specific corrective measures lies with the committee**, including procedures in accordance with the [Principles of Disciplinary Procedure](#), with the rules relating to a relationship other than employment, or in accordance with another contract. The committee will then inform the competent person of the decision that has been adopted, and they will inform the whistleblower in writing without undue delay. The committee is not bound by the proposal put forward by the competent person for remedial action and may adopt other appropriate measures, accept in part the measures proposed by the competent person, or change the deadlines for their implementation, etc. However, the committee must justify its decision.

8.3. Assessment that the report is knowingly false based on intentionally false facts:

- The consequence of this is the initiation of disciplinary proceedings in accordance with the [Principles of Disciplinary Procedure](#) or other proceedings, including criminal proceedings (depending on the relationship between the whistleblower and PIN), against the whistleblower. **A decision regarding the specific measure is adopted by the line manager or other supervisor** according to the organisational chart.

8.4. Assessment that the report is not, but should have been, a report submitted in accordance with the WPA or that such report is unjustified:

- The competent person then informs the whistleblower in writing without undue delay, and the whistleblower is also informed of their right to submit the report to a public authority.

8.5. Assessment that the report is justified and that it concerns a complaint by recipients of aid abroad:

- In the case of investigation of a report submitted to a designated person on a foreign mission, **the immediate superior** of the person against whom the report is submitted, or the next highest superior according to the organisational chart, the committee or the designated person **decides on the justification of the report**, always depending on the nature of the severity of the reported conduct. The procedure is set out in Procedure for handling of complaints and submission of feedback (abroad) – *CFRM*. The competent person is always involved in an investigation abroad if there is a major breach of the *Code*.
- Both the whistleblower and the person to whom the report was submitted are **always** informed **of the outcome of investigation of the report**.

9. Deadlines for Handling Reports

9.1. The justification of a report which has been submitted must be assessed and investigated within 30 days of its receipt. In factually or legally complex cases, this deadline may be extended by up to 30 days.

9.2. In the case of a submission in accordance with the WPA, the deadline may be extended by 60 days (the whistleblower will be informed of the extension and the reasons for it).

10. Is There a Record of Reports Which Have Been Submitted?

All persons who receive reports are obliged to make a record of them, according to the nature of the report, on restricted access platforms.

11. Basic Principles of Investigation of a Report

11.1. Confidentiality

PIN handles all complaints or reports confidentially and sensitively. **Information about the identity of the whistleblower may only be provided with their written consent.** An exception to this is cases where information must be provided to public authorities in accordance with other legislation. Therefore, **this Policy encourages whistleblowers to include their names in any report they may submit.** As anonymous complaints or notifications are less credible, it is not possible to ensure full compliance with the established procedure for the assessment of reports.

11.2. Protection from retaliation

The whistleblower is guaranteed protection **from retaliation**. Retaliatory measures are those measures that may cause harm to the whistleblower, affect their role as an associate of People in Need, and are causally related to the report that was submitted. Retaliation may take the form of intimidation, threats, reprisals or revenge as a result of reporting an incident or the following action, in particular:

- termination of the employment relationship or non-renewal of a fixed-term employment relationship,
- termination of a legal relationship based on an alternative employment contract pursuant to Sec. 75/Sec. 76 of the Czech Labour Code,
- dismissal from the position of management employee,
- a reduction in pay, remuneration, or not being acknowledged a personal bonus,
- prevention of professional development,
- termination or withdrawal from the contract, etc.

If a whistleblower makes an **unsubstantiated report** in good faith which is not confirmed during subsequent examination and investigation, no action will follow. However, if the whistleblower submits a **deliberately false report**, then procedure in accordance with the Principles of Disciplinary Procedure according to the preceding paragraph shall not be considered retaliation.

The whistleblower, as well as any person who provided assistance in establishing the information contained in the report, in submitting the report itself or in assessing its validity, any person who is closely related to the whistleblower and any person who is an employee or colleague of the whistleblower is protected against any retaliatory measures. If a PIN employee is found to be guilty of retaliatory action, disciplinary proceedings will be commenced against them, including possible dismissal.

11.3. Due process

The rights of all parties will be respected during the investigation of a report, whereas all of them will always be treated with **respect and dignity and the presumption of innocence will be maintained**. Any intentionally false or malicious statements or allegations made by another associate or third party will be deemed a major breach of the Code and will be dealt with in accordance with this Policy.

12. Summary of Major Breaches of the Code

12.1. Discrimination

Unjustified and unfair treatment on the basis of personal or group characteristics such as gender, age, ethnicity, religion, etc., manifested in various areas such as employment, education or health.

12.2. Harassment

Conduct which violates the dignity of another person and creates an intimidating, hostile or humiliating environment.

12.3. Intimidation and bullying

The act of inducing fear or feelings of inferiority through threats, with the aim of influencing another person's behaviour, including bullying.

12.4. Abuse of position and power

The unethical use of power or influence for personal gain or to the detriment of others.

12.5. Causing any harm to children

Physical, emotional, or psychological abuse or neglect of children, including commercial and/or sexual abuse.

12.6. Sexual or other abuse of persons

The verbal, visual, non-verbal and physical use of power to sexually or otherwise abuse persons, including modern slavery.

12.7. Violation of the law and support for criminal activity

Participation in illegal activities or activities threatening the activities or reputation of PIN.

12.8. Corruption

Accepting or offering a bribe to obtain a benefit.

12.9. Conflict of interests

Situations where personal interests influence independent decision-making.

12.10. Damage to property, including misuse of funds

Any intentional or negligent act which results in the misuse, loss, damage, devaluation, mismanagement and/or unauthorised or fraudulent use of PIN property and funds provided to PIN by individual and institutional donors or others.

12.11. Misuse of information

Use of any information, especially confidential or sensitive information obtained in the course of work for PIN, for personal benefit or the benefit of a third party.



PIN Safety and Security Policy

In case you have any feedback or suggestions concerning these guidelines, please send them to policy@peopleinneed.net

1. Applicability

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

2. Introduction

People in Need (PIN) is committed to minimizing safety and security risks to all its staff and ensuring that staff members are given training, guidance, technical support and information to reduce their risk exposure while maximizing the impact of our programs. PIN seeks to provide safe and healthy working conditions for all staff, mindful that each staff member is responsible for achieving this.

Particularly in volatile, high-risk environments, PIN management decisions are guided by the principle that addressing security concerns and minimizing the risks to its staff are paramount over any other considerations.

At the same time, PIN remains committed to minimizing any potential negative impacts of our actions on our beneficiaries. Basic principles of this approach are formulated in a separate *PIN Do-no-harm Policy*.

3. Key security strategies and principles

PIN recognizes three key security strategies:

3.1. Acceptance and integration into community

Acceptance of our beneficiaries and in the communities where we work is the cornerstone of effective security management. It is best assured when PIN and staff are well integrated into the local community and valued for their contributions to local development and/or humanitarian relief. PIN’s overall approach, program design and staff behavior will be based on the acceptance approach and principles of transparency, accountability, respect and participation towards beneficiaries, local authorities, partner organizations and other stakeholders. Adherence to the key humanitarian principles of humanity, impartiality, neutrality and independence as formulated in the *IFRC Code of Conduct* is essential.

3.2. Protection measures

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

3.3. Deterrence as a last resort

In extremely high-risk environments, deterrence measures (such as armed guards or suspension of activities) can be put in place, but only as a last resort and after the written approval of the Relief and Development Department (RDD) Director.

Key related principles are as follows:

3.3.1. No involvement with armed forces

Engagement with any local or international armed forces is strongly discouraged and has to be limited to essential access negotiation, humanitarian coordination and in exceptional cases life-saving activities.

3.3.2. Priority to human life

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

3.3.3. Proportionality of the risks

The achievable impact of our activities should always outweigh the risks involved. This ratio must be continuously monitored and reassessed, particularly when designing programs in new countries and regions, or during changes to local security dynamics. Operations where the security risks are disproportionate to the potential program benefits shall be avoided or suspended. Potentially life-threatening activities might be undertaken in cases when the intended impact will likely protect or save beneficiaries' lives.

3.3.4. Precaution

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

3.3.5. Right to decline

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

4. Roles and responsibilities

4.1. Senior management roles and responsibilities

4.1.1. Duty of care towards PIN staff

PIN defines its duty of care towards its employees as an obligation of the employer to maintain the safety, security, health and wellbeing of our personnel and their eligible family members and to mitigate or address foreseeable risks that may cause them harm or injury.

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

General rules and approaches are defined in the PIN Duty of care policy, while for every Red country, a contextual Duty of care policy shall be developed.

4.1.2. Duty of care towards partners

PIN is not legally liable to provide the duty of care to our partners, but there is a moral and ethical obligation to support their safety and security arrangements to a maximum extent. This is particularly important when working with international or national partners in a consortium set-up, where clear responsibilities and procedures related to security management need to be established.

4.1.3. Integration of security management into the program management

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

4.1.4. Preparation of Security Management Plan (SMP)

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

4.1.5. Information about the risks

PIN management has to ensure that all staff are duly informed about and accept existing risks and have sufficient awareness about risk-mitigation strategies. The Risk Assessment Matrix (RAM) relevant to each country or context must be communicated to all staff members as part of their induction.

4.1.6. Provision of training

Training, learning opportunities, necessary resources and support will be provided by PIN to all staff members so that they can fulfil their assigned responsibilities and work effectively and safely in their respective areas of operation. The list of mandatory and facultative trainings is listed in the supporting documents.

4.1.7. Adequate staffing and division of responsibilities

PIN Country Directors (CDs) have the ultimate responsibility for the implementation of the security-related arrangements. In significantly volatile and insecure environments (countries classified RED in PIN ranking system), PIN shall recruit at least a dedicated country level Security Officer, possibly with extended team depending on the complexity of context. In every office a Security Focal Point shall be appointed. Security Officer(s) and Security Focal Points will monitor and advise on safety and security risks, develop and apply security procedures and assist in integrating safety and security measures into programs and operations. At PIN headquarters, RDD management supervises the Security Advisor(s) who maintain an advisory role and have no managerial responsibilities, while the Regional Directors serve as the key HQ focal points for the security related issues including incidents management

4.1.8. Adequate budgeting

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

5. Staff roles and responsibilities

5.1. Security is everyone's job and concern

All PIN staff shall actively participate in, contribute to and adhere to the maintenance of safety and security measures, awareness of security risks and team security as relevant to their placement and position. PIN staff shall extend reasonable support to the safety and security of our implementing partners (particularly when working in consortiums) and beneficiaries including safeguarding and coordinating with other humanitarian actors.

5.2. Impact of individual action

Through their individual actions, all PIN staff bear responsibility for their own safety and security and should exercise common sense to ensure both. Simultaneously, PIN staff are not only responsible for the impact of their behavior and actions on themselves, but also on the safety and security of their fellow staff, beneficiaries, partners, PIN programs, reputation and assets, and in some cases on other humanitarian actors and wider humanitarian community as well.

5.3. Respecting PIN Code of Conduct and local culture

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

5.4. All security incidents must be reported

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

5.5. Compliance with the security procedures

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

5.6. Adequate staff induction

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

6. Health and Safety

6.1. PIN obligations related to work safety

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

6.2. Employee's health and responsibilities

Wherever required and feasible, PIN will assess the fitness of employees for work before employment through pre-employment health screening. In situations when the risks of deploying an employee with a specific health condition would be too high, PIN reserves the right to cancel his/her deployment. For its international employees, PIN will provide remote counselling services for physical and mental health during employment. The counselling services are optional based on the employee's decision, while PIN management reserves the right to make them mandatory. While PIN will do its utmost to uphold a secure and safe working environment, all staff remain ultimately responsible for their own health.

6.3. Insurance coverage

PIN is committed to securing comprehensive insurance policies to safeguard against health, psychological, financial and material losses related to security, health, and safety incidents. This includes liability insurance, property insurance, travel, health and accident insurance for our staff. Regular reviews of insurance policies are conducted to ensure they remain adequate and up to date with the evolving risk landscape.

6.4. Vaccination

All international PIN staff are responsible to arrange adequate vaccination based on the vaccination policy issued by or for the visited country and in accordance with PIN country-based guidelines. PIN will cover the cost of these vaccinations, but it remains the ultimate responsibility of an employee to receive the appropriate vaccination or renew it before its expiration date. Vaccination records have to be kept up to date. Based on a specific epidemiological situation and in line with the requirements of the local health authorities, the vaccination of national staff will be considered as well.

6.5. Country specific Medical Plans

Customized country-based Medical Plans shall be in place. As the minimum, these must include guidance related to:

- accessibility of quality health care, medication and treatment;
- ambulance services and domestic and international medical evacuation;
- response plan to sexual assault incidents.

6.6. Other country specific guidance and provisions

Apart from the procedures outlined in the Medical Plans, other emergency procedures must be in place and duly implemented, particularly those related to the safety of travel, fire evacuation, electrical safety, natural disasters and other significant risks.

6.7. First aid

First aid kits must be accessible in all PIN offices facilities, relevant project sites and PIN-operated vehicles. PIN management must ensure that every PIN staff member receives 1st aid training and is regularly retrained.

7. Operational procedures

7.1. Country/regional risk analysis

PIN assesses the level of risks to PIN staff and assets in countries of our operations through a three-level ranking:

- Red (high, very high or extreme level of risks, volatile environment including all conflict countries)
- Orange (medium level of risks with some security and/or safety concerns)
- Green (insignificant or low level of risks, reasonably safe and secure)

Country ranking must always assess all three dimensions of security, health and safety. Requirements for related standards and protocols in individual countries shall be organized accordingly. In countries where certain regions present significantly different risks, separate regional rankings must be in place.

7.2. Risk assessment and Security Management Plan (SMP) come first

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

7.3. Role of field offices

Field Offices will ensure that the design, planning, operations and implementation of PIN programs incorporate acceptance as our default security strategy. All major stakeholders who can potentially affect and influence PIN programs and their delivery will be consulted regularly, and an appropriate relationship will be maintained.

7.4. Crisis and incident management

In case of a security, health or safety incident, immediate action will be taken to contain and mitigate the impact. All staff must report any suspicious activity, breaches, or incidents to the designated personnel without delay

In case of critical incident, RDD management will proceed according to the *PIN Policy on Crisis Management*. This includes activating the crisis management team, ensuring clear communication channels, and mobilizing resources for an effective response. Post-incident reviews will be conducted to identify root causes and implement preventive measures to enhance our security posture. Regular training and simulations will be conducted to prepare staff for potential incidents and ensure a swift, coordinated response.

7.5. Evacuation and relocation principles

In the event of a significant threat, PIN may decide to evacuate (across international border) or relocate (domestically) its staff and/or recommend its staff to evacuate or relocate to a safer location both domestically and internationally. If such situation arises, PIN is committed to:

- evacuate the international staff members and accompanying dependents to a safer location in a neighboring country or to their home country or to relocate them domestically
- relocate the national staff members and their immediate family posted outside of their place of residency to a safer location within their home country.

In case of extreme urgency and life-threatening situations, PIN will try to support the relocation and/or evacuation for both national and local staff and their immediate families. This applies particularly to the situations, where any national or local staff and their immediate family might be at risk as a direct consequence of their work with PIN, or because of their ethnic origin, or if they are exposed to an imminent or targeted threat. However, such assistance depends on circumstances and available options and PIN cannot guarantee it.

The refusal of a PIN staff member to evacuate or relocate, and in doing so jeopardizing their own safety or safety of any other PIN staff member, may result in the staff member’s immediate dismissal. Regardless of the reason, any PIN staff member and their dependents refusing an evacuation/relocation order must acknowledge in writing that they remain at their own risk and that PIN will not accept responsibility for their safety.

7.6. No use of firearms

PIN staff must not carry or use firearms/weapons at any time. The presence of firearms, weapons of any type or armed personnel in any PIN facility or vehicle is prohibited unless there is an immediate threat to life, or the proper approval procedures have been followed to allow protection of PIN staff and property. PIN will use armed escorts and guards only as a last resort, or when required by local authorities and in support of life-saving activities.

7.7. Abduction, kidnapping and no-ransom policy

In the event of an abduction or kidnapping of a PIN staff member:

- PIN will use all appropriate means to secure the release of staff member(s)
- At the same time, PIN will not give in to the demands and will observe its no-ransom policy.
- PIN will maintain confidentiality about the negotiation process and will request the same from government authorities, hostage negotiators and/or family members.
- PIN will closely liaison with family members, provide necessary information and offer support to families throughout and after the ordeal.
- PIN will ensure that post-abduction procedures will include the organizational debriefing, access to professional counselling and other assistance deemed necessary to support the recovery of the affected staff member(s) and their family.

7.8. Cyber security

PIN is committed to protecting the integrity, confidentiality, and availability of our digital assets, data and information systems, while we are also committed to protecting our staff, partners and beneficiaries from risks connected to cybersecurity. We recognize that a cyber security breach can develop into a physical security threat to our staff and our beneficiaries.

Management is required to create and implement effective cybersecurity mitigation measures under the guidance of PIN Cybersecurity department and RDD Cybersecurity Manager. This includes developing robust security protocols, conducting regular risk assessments, and ensuring that all systems are up to date with the latest security patches and defenses. Cybersecurity awareness must be regularly conducted through training programs, ensuring that all staff are informed about current threats and best practices.

All staff members are expected to exercise utmost caution in the digital and online environment. This involves adhering to established security protocols, being vigilant about potential phishing attempts and suspicious activities, and promptly reporting any security incidents or concerns. Staff should regularly update their passwords, use multi-factor authentication where possible, and avoid using unsecured networks for accessing organizational resources.

7.9. Safeguarding and security

By safeguarding we understand the protection of people, including children and at-risk adults, from harm that arises from coming into contact with PIN staff or programmes. For more details, see the *PIN Safeguarding policy*. There are significant overlaps between the safeguarding and security agendas, and we must recognize that a safeguarding incident can relatively quickly escalate into a security one with a dire consequence for the perpetrator and/or PIN team or even into a full-blown crisis. As the reporting channels for these incidents are usually different, it is important to rightly estimate the risks of potentially negative development of any safeguarding incident and to make sure that the security team, Country Director and any other relevant staff are alerted in a timely manner.

7.10. Utilization of media and social networks

Unwise and uncontrolled interaction with the media and the use of social networks can jeopardize the security of PIN staff, partners, beneficiaries and/or program. Interaction with the media can be handled only by designated persons, while social networks should be used in a restrained manner, respecting the *PIN Media Policy*. In case of security incidents involving PIN staff, it is strictly forbidden to share any confidential information through social media or other channels.

8. Final waiver

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

9. Supporting and related documents

	Policy/guidance	Target audience
1	PIN Code of Conduct and Key policies	All staff
2	Policy on humanitarian access and engagement with NSAGs	RDD management and all CP Management Team members
3	Crisis management policy and protocols	RDD management and all CP Management Team members
4	Duty of care minimum standards	RDD management and all CP Management Team members
5	Guidepost	All staff



People in Need
Šafaříkova 635/24
120 00 Prague 2
Czech Republic

peopleinneed.net

People In Need Staff Informed Consent

I (name and surname):

Citizen of:

ID/Passport No:

Permanent address:

I hereby confirm that I was informed about all the potential and particularly safety and security risks including their mitigation related to my assignment(s) as specified in the Terms of Reference (and/or other documents stating my contractual conditions) and I fully understand and assume them.

Further, I confirm that:

- I will attend all the sessions of **PIN Induction Training** (personally or through webinar) as instructed
- I was informed about my **obligation to undergo e-learning courses** assigned to me and how to attend them; I hereby undertake to attend these e-learning courses within **30 days from beginning** of my contractual relationship with PIN; I was informed that my refusal or failure to undergo the e-learning may be considered as a breach of my obligations and may result in adequate disciplinary actions
- I am familiarized with the following policies, I understand them and I undertake to conduct myself in accordance with them: [code of conduct and key policies](#). Key Policies include Key Policies include **Safety and Security Policy, Safeguarding Policy, Protection from Sexual Exploitation and Abuse Policy, Child Protection Policy, Anticorruption Policy, Conflict of Interest Policy and Whistleblowing Policy. Safety and Security Policy, Safeguarding and Protection from Sexual Exploitation Abuse and Harassment (SEAH) Policy, Anticorruption Policy, Conflict of Interest Policy and Whistleblowing Policy.**

Electronic copies of PIN core policies are available at:

www.clovekvtisni.cz/policies. and the complete text is available *in* [ELO](#)

I will familiarize myself with the **following documents** at my earliest convenience and at the latest during PIN Induction Training; I undertake to conduct myself in accordance with them:

- Risk management policy
- Data Protection Policy
- Employee Damage Liability
- PIN Media Policy
- PIN Environmental policy
- PIN Do-no-harm policy
- Human Resources policy
- Electronic copies of the policies are available *in* [ELO](#)
- Pre-deployment information, including vaccination instructions and information
- Conditions of travel insurance (if applicable) provided by PIN and I accept it as a whole
- Security framework relevant for the country of assignment
- And other relevant documents related to my visit to a Country Program

I was informed about relevant vaccination necessary for my assignment and I will proceed accordingly to the instructions and recommendations. I understand how to report any unethical behaviour I might witness while working in PIN and I acknowledge my duty to report. I am aware about safeguarding standards at PIN and I commit to adhere to them. I hereby certify that I have never been affiliated with any illegal armed or terrorists' groups. Further, I certify that I have never been convicted of any felony or misdemeanour

regarding children and I am aware that any breach of these representations and warranties or any act breaching safeguarding standards and PIN policies in the future will result in immediate termination of employment with PIN and possibly other legal actions.

I am aware that in case the country of assignment changes in the course of my contractual relationship with PIN that I will actively familiarize myself with the relevant updated information. I am well aware of the fact that I may travel to the areas classified as dangerous/hazardous and possibly not recommended for travel by the Ministry of Foreign Affairs and/or other relevant authorities of my country of residence, country of destination or of the Czech Republic. I will familiarize myself with the relevant instructions and take all necessary steps according to PIN Security Policy and other policies to avoid risky behaviour and to minimize risk on myself and people traveling with me. I will take these recommendations and alerts into consideration and if there are reasonable grounds that the risk to my personal safety and security or the safety and security of my family as well as other people concerned is unacceptable, I am aware of my right to decline to travel.

I hereby also certify that I received explanation of areas described above verbally and/or through distributed materials and access to e-learning. I was further instructed of what it means to assume the risk of travelling and working in insecure environments. I am well aware of the potentially associated risks including, but not limited to the loss of life, kidnapping, car accidents, armed assaults and robbery, physical injuries, diseases and mental harm that might cause short and long-term adverse consequences. I will actively review my individual position with respect to the safety and security risk assessment and inform/bring concern to the attention of the management and other people in charge of security.

In case of travelling with minors under 18 years of age and other dependent persons, it is my obligation to familiarize these persons with all information provided to me in the same extent and with the same importance. Furthermore, I undertake to assume the responsibility in respect of these persons and I undertake to supervise their behaviour and take necessary measures if they don't follow PIN instructions. PIN renounces responsibility in case of a lack of information (disinformation) or in case of inadequate measures taken in relation to these persons.

I hereby confirm, that I was informed in a separate document about the processing of my personal data by PIN.

I certify that the information provided in the *Next of kin* document⁴⁶ is correct and I commit to update it when relevant.

I confirm that this Informed Consent is an expression of my free and true will and I have read and understood the above mentioned documents and policies in full in witness thereof I attach my signature.

Signature: _____ Date _____

⁴⁶ The filled *Next of kin* form is saved in *Personal Info* subfolder in the *Personal* folder set up in ELO: *15 Human Resources – Personalistika_Personal - osobní_Letters*