

## **Security and Emergency Medical Policy for Overseas Assignments**

CDA will take all reasonable measures to safeguard the security and health of staff while on overseas assignments. We expect partners and consultants with whom we work to do likewise.

### **Overview: Vulnerability to violence and injury**

The nature of CDA's work means that staff and consultants are frequently required to conduct assignments outside the United States of America and often in war zones or countries recently emerging from mass violence. They are frequently required to travel and conduct their activities in environments of poor security and/or health risk. In more stable environments, CDA staff may still be exposed to threats of criminal violence and opportunistic crime. These risks are inherent in the nature of our work and CDA has a duty of care to minimize these risks to staff and those we work with to the fullest extent possible.

The way CDA staff and consultants conduct themselves as they go about CDA-related business in these environments will have an impact not only on the success of the assignment but also the reputation of CDA. It will also have an impact on the safety of CDA's partners and the communities that CDA staff and consultants engage with. These impacts may extend beyond the duration of the assignment itself and beyond the location of the assignment. All staff and consultants therefore have a duty of responsibility to avoid actions that may jeopardize CDA's reputation or the safety of colleagues with whom they work.

CDA's duty of care and duty of responsibility of staff extends to those that we interact with during assignments. To this end, CDA will not attribute comments to our partners and communities in CDA reports without their express permission. Where necessary, CDA will invoke exclusion clauses of the International Aid Transparency Initiative (IATI) and other disclosure requirements to protect their identity.

The policy and the procedures outlined in this document are intended to provide a clear statement of CDA's expectations and processes in order to minimize these risks. They embrace two inter-related aspects of staff well-being during assignments – security and health. They outline emergency procedures in the event that CDA staff are affected by a security incident or health problem and require emergency medical assistance during the course of overseas assignments. CDA will also encourage consultants and local partners to ensure they have appropriate security and emergency medical procedures in place.

This policy and procedures should be read in conjunction with other CDA policies and procedures including but not limited to the Personnel Manual, the Anti-Bribery Policy (2011) and the Child Protection Policy (2010). As with these other documents, this policy and these procedures are subject to revision, as necessary, and contextualization, as appropriate.

## **Why have a Security and Emergency Medical Policy?**

CDA staff are our greatest resource; we have a duty of care to avoid placing them in situations of personal risk without a robust process for assessing risk. CDA will take reasonable steps to minimize the exposure of staff, consultants and partners to inherent security and health risks in the course of their work. However, these risks cannot be completely eliminated and, therefore, this policy also contains procedures for responding to security and health-related incidents if they arise.

Ultimately, it will be the responsibility of individual staff and those with whom we work to assess risks on a day-to-day basis and take appropriate avoidance action. They must do so in the knowledge that CDA employees will not be required to travel to unsafe or unhealthy locations against their will. Any reasonable decision to decline to travel on the grounds of insecurity and/or detrimental impacts to personal health will not be penalized.

## **To Whom does this Security and Emergency Medical Policy apply?**

All CDA staff are expected to follow and comply with this policy. Failure to do so may constitute grounds for disciplinary action. All staff will be provided with a copy of this policy and are expected to ensure that they are fully aware of its provisions and requirements. The COO will be responsible for bringing this policy to the attention of new staff and providing security briefings as necessary.

CDA is not legally responsible for the security and health of non-staff (consultants or local partners) unless specifically stated in the contract, agreement or other binding document. However, in the interest of maintaining CDA's reputation, they will be encouraged to adhere to this guidance. CDA is also not legally responsible for family members accompanying staff on assignments, unless agreed prior to departure.

As a general rule, CDA will not expect consultants or our local partners to take part in activities or travel to areas where we will not send our own staff, unless it is clear that they are less at risk than CDA staff. CDA reserves the right to instruct consultants or local partners to postpone all CDA-related assignments in areas deemed to be unsafe on security or medical grounds.

## **When does the Security and Medical Emergency Policy apply?**

The policy applies to all CDA field missions outside of USA. Since, during the course of a field mission, it is usually difficult to distinguish between activities that are CDA-related and those that are leisure activities, this policy applies 24 hours per day, 7 days per week for the duration of the assignment.

Staff and consultants who remain in locations beyond the duration of the CDA assignment (e.g. for vacations or other non-CDA work) will do so at their own risk. In the event that an individual (staff member or consultant) experiences security difficulties or medical problems during this extended stay, CDA may decline to assist if s/he is deemed to have taken an unnecessary risk.

## **Security Strategy**

CDA's overarching strategy for ensuring the security of staff, consultants, local partners and communities is **risk avoidance**. CDA will adopt a dual approach to risk avoidance – **acceptance** and **vulnerability reduction**. These approaches are mutually reinforcing – one without the other is insufficient.

The first line of risk avoidance - gaining acceptance and consent for one's presence from communities and other local actors - is part of normal practice for CDA. Therefore, it generally does not require CDA staff, partners or consultants to substantially alter the way they usually conduct themselves on missions. We will continue to strive to build respectful relationships with those we work with in the field.

The second line of risk avoidance - vulnerability reduction - involves implementing procedures that aim to reduce exposure of CDA staff and partners to threats affecting organizational security and individual safety. Necessarily, it implies clear lines of authority regarding decision-making and robust reporting requirements in the event of security incidents.

### **Prior to departure**

CDA will not encourage staff to put themselves in danger. However, staff and consultants are expected to assess personal security risks for themselves in order to ensure that they are fully comfortable with proceeding on the assignment. Each individual, on a particular assignment involving more than one staff member and/or consultant, is expected to understand, weigh and ultimately accept the security risks. Accordingly, CDA staff should review travel advisories, United Nations security ratings and other relevant security advice as well as consult local partners on personal security risks prior to departure and throughout the assignment. Where risks are excessive, travel should be deferred or cancelled. If in doubt, staff and consultants should consult the Chief Operations Officer and Executive Director. *In extremis*, they may determine that travel is not permitted to particular locations where security risks are considered to be disproportionate to the potential program benefits.

#### ***Procedures***

- Staff and consultants should review available security risk assessments prior to departure and, if in doubt, consult the COO and ED.
- The date of commencement and conclusion of all CDA-related activities outside of USA should be reported to the CFO prior to departure. Any subsequent extensions for CDA-related activities should be notified in advance. Any non-advised extension will be deemed to be non-CDA related.

### **During overseas assignment**

In proceeding with overseas assignments, staff and consultants are implicitly accepting responsibility for managing their personal security. Each staff member and consultant must realize that his/her conduct will not only affect his/her security but also the security of those with whom they work. Notwithstanding security assessments obtained prior to departure, s/he

should obtain security updates and details of curfews from the most reliable sources available to him or her throughout the assignment.

Where the assignment involves more than one CDA staff member and/or consultant, the senior CDA staff member will normally assume overall responsibility for critical security decisions affecting the CDA team. However, no team member (CDA, partner or consultant) will be pressured to participate in activities that s/he feels may jeopardize her/his safety.

### ***Procedures***

- Obtain best possible information on current security situation throughout the assignment from available sources, such as partners, UN and NGO security offices etc
- Discuss and advise partners and other team members of in-country travel plans. Confirm departure and arrival with them.
- Observe curfews.

### **After overseas assignment**

Reporting security (even 'near miss') incidents will enable CDA to improve security policy and procedures. It will also enable CDA to fulfil its duty of care obligations and provide follow-up support to staff. Therefore, CDA staff and consultants must report all security-related incidents to the Chief Operations Officer on return to the Cambridge office. All security incidents will be documented by the Chief Operations Officer who will notify the Executive Director and Chief Financial Officer with recommended follow-up actions (if any).

### ***Procedure***

- Report all security incidents to the COO

The Chief Operations Officer is the designated point of contact for all issues and enquiries related to organizational and personal security issues while travelling overseas for CDA-related work.

## **Emergency Medical Strategy**

CDA provides emergency medical insurance coverage through International SOS Assistance, Inc. ([www.internationalsos.com](http://www.internationalsos.com)) for all staff traveling overseas on behalf of CDA. Individual staff who are not annually covered must let the CFO know about travel prior to leaving so that the appropriate coverage may be additionally purchased.

The insurance coverage provides medical evacuation and treatment at a reliable medical facility or hospital nominated by the insurer. International SOS Assistance, Inc will decide whether an evacuation is required in the event of a medical emergency. Evacuation will normally be to the nearest reliable medical facility or hospital, which may not be in the United States.

Consultants are expected to provide their own emergency medical insurance coverage. In exceptional circumstances, CDA may be able to arrange for emergency medical coverage with CDA's insurers at the consultants expense, for the duration of the assignment.

### **Prior to departure**

All staff are encouraged to obtain medical advice, vaccinations and prophylaxis to minimize the risk of health-related emergencies while travelling on CDA missions. Staff are also responsible for apprising themselves of the coverage of services provided by CDA's emergency medical insurance provider, including the relevant procedures in the event of an emergency.

#### ***Procedures***

- Staff should obtain travel medical advice and mandatory vaccinations.
- Staff should familiarize themselves with the emergency medical arrangements.

### **During overseas assignment**

In addition to the preventive advice taken before the assignment, CDA staff and consultants are expected to take reasonable measures to protect themselves from illness and injury while travelling overseas on CDA business.

In the event of a medical emergency while overseas, the staff member should follow the procedures advised by the insurance provider and its representatives. The staff member should then advise the Chief Financial Officer at the earliest possible opportunity of the mobilization of CDA's emergency medical insurance provider. The Chief Financial Officer will, in turn, notify the Executive Director and Chief Operations Officer, as appropriate.

#### ***Procedures***

- All CDA staff should carry the International SOS membership card at all times while overseas. This provides emergency contact numbers and website details for International SOS as well as the policy number and coverage type.

### **After overseas assignment**

Staff and consultants (where relevant) must report all injuries and health-related issues likely to result in claims on CDA's emergency medical insurance coverage to the Chief Financial Officer on return to US. This information will be treated as strictly confidential and is required solely for processing claims.

#### ***Procedures***

- Report all injuries and health issues resulting in claims on CDA's emergency medical insurance policy.

The Chief Financial Officer is the designated point of contact for all issues and enquiries related to emergency health issues while travelling overseas for CDA-related work.

## **CDA Child Protection Policy**

*Children are neither the property of their parents nor the passive objects of charity. They are human beings and are the subject of their own rights and not just their needs.*

(International Society for Prevention of Child Abuse and Neglect, 2005)

Staff, volunteers and contractors of CDA Collaborative Learning Projects Inc (hereafter CDA) are expected to uphold and promote the highest standards of ethical and professional conduct. All individuals associated with CDA shall therefore, at all times and in all circumstances, refrain from acts of misconduct and respect the dignity of those with whom they have contact.

CDA respects the UN Convention on the Rights of the Child (1989). This includes the right to freedom from abuse and exploitation. In many contexts where CDA is involved, protective mechanisms for vulnerable children have been eroded by poverty, conflict or disaster.

CDA is a child-friendly organization. We value their potential and we support our staff, colleagues and partners to raise their children to realize this potential. We expect them to treat other children who they come into contact with during the course of their work with CDA in the same respectful manner.

This Child Protection Policy represents CDA's commitment to safeguard children<sup>1</sup> from abuse, exploitation, violence and neglect by individuals and institutions with whom CDA engages or by processes that CDA participates in. It comprises the policy statement itself and a Code of Conduct. It applies to all interactions with children in the course of CDA's work or when on CDA-funded missions. It does not apply to the interactions of staff with their own children.

The policy was approved by the CDA Board of Directors on December 14, 2010.

### **Zero tolerance**

The overarching principle of CDA's Child Protection Policy is zero tolerance for child abuse and sexual exploitation. This means that all forms of humiliating, degrading or exploitative behavior involving children are unacceptable.

- We will never condone physical, mental or sexual abuse and/or sexual exploitation of children by CDA staff, partner agencies or individuals associated with CDA.
- We will investigate allegations of inappropriate behavior by staff and others associated with CDA promptly and according to the best interests of the child.
- We will assist and support staff members or other adults who raise concerns about inappropriate behaviors involving children.

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<sup>1</sup> In accordance with the Convention on the Rights of the Child, 'child' means every human being below the age of 18 years.

- We will immediately transfer to other duties or suspend any implicated staff or contractors pending fuller investigation.
- We will fully cooperate with any external investigation by the appropriate authorities.

Specifically, in the conduct of CDA-related duties, it is prohibited for CDA staff, volunteers or contractors to

- Use language or behavior that is harassing, abusive, sexually provocative, or bullying.
- Engage with children in any form of sexual activity or activity that could be construed as sexual activity.
- Use any equipment including digital cameras, mobile phones, video of any kind to harass children or access child pornography.
- Use physical punishment or physical discipline with unrelated children.
- Hire children for domestic or any labor employment that is not appropriate to their age or interferes with education and other child related activities, or activity that might place them in physical jeopardy.

**How will we ensure these commitments are met?**

- All current staff and volunteers associated with CDA will receive and acknowledge receipt of this Child Protection Policy and the Code of Conduct (attached). The Child Protection Policy and Code of Conduct will be included in the Employee Manual, which will be agreed to in writing by CDA employees and those in volunteer positions.
- Allegations of child abuse or exploitation involving CDA staff will be impartially investigated with due respect to the dignity and needs of the child. The findings of the investigation will be responded to promptly.
- CDA staff and volunteers will be protected from unsubstantiated allegations and no adverse report will be logged in his/her personnel record where these are upheld.
- Any CDA staff member or volunteer who knowingly makes a false allegation will be subject to termination.

**Contractors will be required to comply with CDA's Child Protection Policy.**

- CDA's Child Protection Policy and Code of Conduct will be referenced in all contracts. Contract signature will constitute binding agreement by the contractor to abide by the Policy and the Code of Conduct.
- The contractor will also be responsible and accountable for ensuring that subcontracted parties are aware of and abide by the CDA Child Protection Policy.
- Allegations of child abuse or sexual exploitation will be considered as grounds for immediate and indefinite suspension of contracts pending thorough investigation.
- If proven, these allegations will be grounds for termination of contracts without further compensation and indefinite exclusion from future contracting opportunities with CDA.

## **Complaints management**

Complaints will be dealt with fairly and justly without discrimination or harassment of any party. All information and details related to the complaint will be strictly confidential and released on a need-to-know basis only. Staff or volunteers under investigation will be assigned to other duties for the duration of the investigation. Acts that are illegal can and will be brought to the appropriate law enforcement authority(ies).

The Chief Financial Officer will act as CDA's Child Protection Officer (CPO) and, accordingly, is designated as the 'person of first referral' for all complaints. In the event of a complaint, the CPO will

- inform the Executive Director (ED) and the Chair of the Board of any complaint.
- initiate action to investigate the complaint.
- liaise with any official investigation.
- recommend appropriate action(s) to ED and Chair during and at conclusion of the investigation.
- keep the staff member or volunteer informed of progress in the investigation.
- initiate appropriate follow-up action to the investigation.
- maintain an accurate record of the complaint and investigation separate from the personnel record until/unless the allegation is proven.

## **Review**

The CPO will ensure that CDA's Child Protection Policy, Code of Conduct and complaints management procedures comply with the requirements of our donors as well as our legal responsibilities.

## CDA Collaborative Learning Projects Child Protection Code of Conduct

CDA Collaborative Learning Projects (CDA) believes in and advocates children's rights to survival, protection, and development. We value the potential of children and we support our staff, colleagues and partners to raise their children to realize this potential. We expect them to treat other children in the same respectful manner.

This Code of Conduct includes statements on appropriate and expected standards of behavior of CDA authorized personnel, consultants and others associated with CDA. It is developed with the interest of children in mind and must be utilized with transparency and common sense. It applies to all interactions with children in the course of CDA's work or when on CDA-associated missions. It does not apply to the interactions of staff with their own children.

### **Standards of Behavior:**

- Respect children regardless of race, color, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or any other status. Encourage and respect children's voices.
- Language or behavior that is harassing, abusive, sexually provocative, culturally inappropriate, or bullying is never acceptable.
- Never engage with children in any form of sexual activity or activity that could be construed as sexual activity.
- Never use any equipment including digital cameras, mobile phones, video of any kind to exploit or harass children or access child pornography.
- Never use physical punishment or physical discipline with unrelated children.
- Children should never be hired for domestic or any labor employment that is not appropriate to their age or interferes with education and other child related activities, or activity that might place them in physical jeopardy.
- Always report inappropriate actions or any violations of these Standards.

## **CDA Anti-Bribery Policy**

CDA has a policy of zero tolerance for bribery and corruption. CDA will take appropriate and proportionate action to reduce risks and address allegations of malpractice.

In our dealings with others, CDA does not allow or condone bribery in any form by employees, consultants, or Board members. CDA will strive to comply with all applicable anti-bribery laws and regulations. This includes all applicable local laws and regulations, the U.S Foreign Corrupt Practices Act, the UK Bribery Act and relevant donor policies.

Internally, CDA accurately records all transactions and has robust financial procedures in place to ensure appropriate checks and balances that minimize opportunities for misappropriation of funds entrusted to CDA by our donors. CDA chooses partners who aspire to similar standards and have suitable policies and procedures in place to eliminate bribery and corruption.

CDA's Board of Directors has responsibility for scrutinizing the transactions of the organization in order to provide independent oversight of financial affairs, eliminate conflicts of interest and maintain the reputation of CDA

CDA requires all employees and consultants to comply with this policy and will dismiss officers and staff who are shown to have willfully accepted or paid bribes or otherwise engaged in corrupt practices.

CDA Board members are required to voluntarily excuse themselves, and refrain from discussion and voting on any matter prevents or may prevent that member from acting in an impartial manner.

### **Why an anti-bribery policy?**

CDA frequently reports on corruption and bribery concerns of the people whose lives we ultimately expect our work to improve, i.e. people in communities around the globe who are on the receiving end of international assistance. Ensuring CDA's own policies and procedures are transparent reinforces CDA's integrity with those we seek to assist and to influence as well as our reputation with donors.

CDA's reputation can be bolstered by endorsing and demonstrating high and robust ethical standards on bribery and corruption. Conversely, failure to maintain transparent processes for managing and dealing with risks associated with bribery and corruption has the potential to do immeasurable damage to CDA's reputation in the event that bribery or other forms of corrupt activity occurs – or is perceived to have occurred.

The anti-bribery policy provides CDA staff, Board members, consultants and collaborating partners with a clear organizational statement of CDA policies when confronted with requests for bribes or other forms of incorrect payment.

### **Who does this policy apply to?**

This policy applies to all CDA staff, Board members, consultants and collaborating partner agencies in every instance where they represent CDA in all dealings with non-CDA individuals and organizations.

In the rare and exceptional event that refusal to pay bribe places a CDA staff member or partner at high risk of loss of life, limb or liberty, the Executive Director in consultation with the CDA Board shall have ultimate authority to determine the most appropriate course of action.

### **Associated Policies**

This policy should be read in conjunction with the Security and Emergency Medical Policy (2011), the Child Protection Policy (2011) and relevant sections of the Personnel Manual and Financial & Administrative Manual (including the CDA policy on whistleblowing).

### **Guidance**

*Bribery* – the offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organization's activities.

*Facilitation payments* – These are bribes and are 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.

*Gifts and hospitality* – these can range from small gifts (such as diaries) to expensive hospitality (tickets for major events, holidays etc). Extravagant gifts and hospitality may be used to disguise bribes that are intended to induce improper behavior.<sup>1</sup>

No corrupt payments or extravagant gifts may be made or offered to a government official, employee of a government agency, or an official or employee of a statutory authority, corporation or non-public entity to secure services or induce improper behavior.

No corrupt payments or extravagant gifts may be made or offered to an intermediary or representative who promises to use special connections with government officials, employees of a government agency or an official or employee of a statutory authority, corporation or non-public entity to secure services or induce improper behavior.

Report any suspected violations of the policy by a CDA employee, consultant, or partner. Any reporting will be protected and CDA will fully cooperate with any ensuing investigation by appropriate authorities (see also CDA Whistleblowing Policy).

Accurate and complete records of all financial transactions conducted by or on behalf of CDA will be kept. No records will be falsified to cover up a bribe and CDA will fully cooperate with external auditors conducting the annual audit to verify the allowability of all transactions.

The policies of potential partners will be reviewed for appropriate anti-bribery procedures.

CDA includes an anti-bribery provision in the CDA Employee Standards (Section 8, CDA Personnel Manual) and in the Consultant Standards section of our contracts.

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<sup>1</sup> "Anti-Bribery Principles and Guidance for NGOs". June 2011. Bond for International Development.

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All information and details related to the complaint will be strictly confidential and released on a need to know basis only. Staff or volunteers under investigation will be assigned to other duties for the duration of the investigation. Acts that are illegal can and will be brought to the attention of the appropriate law enforcement authority(ies).

The Chief Financial Officer is designated as the 'person of first referral' for all complaints. In the event of a complaint, the CFO will

- inform the Executive Director (ED) and the Chair of the Board of any complaint.
- initiate action to investigate the complaint.
- liaise with any official investigation.
- recommend appropriate action(s) to ED and Chair during and at conclusion of the investigation.
- keep the staff member or volunteer informed of progress in the investigation.
- initiate appropriate follow up action to the investigation.
- maintain an accurate record of the complaint and investigation separate from the personnel record until/unless the allegation is proven.

## **Key Risk Areas**

The following areas require additional attention to maintain best practice in due diligence, internal approvals, reporting, documentation, and document retention

- **Travel Expenses**—CDA employees, consultants, and Board members will follow the policies and procedures outlined in the CDA Financial Administration Manual with regard to risks associated with travel-related expenses.
- **Fees and Expenses**—CDA employees, consultants, and Board members will follow the contracting and payment policies outlined in the CDA Financial Administration Manual with regard to risks associated with incorrect fees and expense payments to Government officials, business partners, and partners or to their relatives.
- **Gifts**—CDA employees, consultants, and Board members will not make gifts either directly or indirectly on CDA's behalf to Government officials, business partners, or partners, or to their relatives. CDA employees will be required to declare gifts received during the course of—or in relation to—their CDA work to the CFO, who will advise on their appropriateness and, where necessary, record the gifts.
- **Facilitation payments ("grease")**—CDA employees, consultants, and Board members will not make facilitation payments either directly or indirectly on CDA's behalf to Government officials, business partners, or partners or to their relatives.
- **Political contributions**—CDA employees, consultants, and Board members will not make financial or in-kind contributions either directly or indirectly on CDA's behalf to Government officials, political parties or organizations for political campaigns.