

Code of Conduct & Policy on Ethical Standards

Document 1 CODE OF ETHICS

Preamble

This code of ethics and professional conduct outlines the ethical principles that govern decisions and behavior at our organization. The content has been enriched thanks to contributions and inputs from our networks, and most of all, from the local communities we serve.

As a humanitarian organization, we are concerned about ethics because we are part of a system that engages in the delivery of humanitarian aid and developmental cooperation whose activities affect the lives and futures of vulnerable populations. It is a sphere of work where different principles interact, sometimes causing difficult dilemmas and tough decisions. In challenging times, awareness of and adherence to the ethical frame is our surest guide to decisions and actions that do not violate the principles of saving lives, alleviating suffering, and building sustainable communities.

This policy paper ensures that ethics are integrated into our organization and its action. We take an inclusive approach in developing this policy.

The public trust and confidence placed in Way to Health Charity Foundation must be treasured and never taken for granted. The highest standards of conduct, competence and performance are expected of all Way to Health employees, managers and directors, consultants, contractors, field operators, interns, suppliers, and temporary collaborators who engage in the areas of work that Way to Health is active in. Expectation of fulfilling these standards extend to organizational partners as well.

Way to Health's Ethical Principles

We hereby adhere to the following principles in the course of doing our work as humanitarian and developmental actors. All those who have professional engagements with Way to Health are expected to conduct themselves with integrity and in a manner compatible with these principles. Disrespectful behavior, a lack of the minimum level of courtesy and dignity in interaction with

others, or inappropriate conduct, comment or display that either insults, denigrates, disparages or humiliates someone or depreciates their value, amounts to a breach of ethical principles and may lead to a termination of relations with Way to Health.

- **Humanity:** We show concern for human welfare and respect for the individuals, their aspirations and their conditions and never reduce them to the situation in which they are found. We raise awareness and seek alleviation in situations of traumatism and and/or conflict.
- **Impartiality:** We maintain a very good knowledge of the context, quality in the collect of information and assessment, and good contacts with actors in order to effectively assist in the provision of humanitarian assistance in proportion to need, and give priority to the most urgent needs, without discrimination.
- **Independence:** We maintain freedom in our choices of projects and modes of intervention, acting only under the authority of the organization's governing body and in line with the organization's purpose. That implies a constantly updated rereading and analysis of the influence of the constraints of the environment, which includes NGOs and their donors, the host government, political factors, and all other factors that try to dictate on Way to Health's decisions and actions.
- **Commitment:** We maintain our availability and accessibility for programming that will enable us to alleviate the suffering of those who are wounded or affected by injustice.
- **Complementarity:** Working as a responsible member of the aid community, we coordinate with others to promote accountability to, and coherence for, crisis-affected people.
- **Duty of care:** We seek to meet the recognized minimum standards for the well-being of crisisaffected people, and pay proper attention to their safety and the safety of staff and collaborators.
- **Information:** We decide and act only on the basis of a reasonable amount of facts that support our choices. Furthermore, we agree to give an account to public opinion of our presence in the field, of its effects, and of what it was able to reveal about the context or the conflict.
- **Accountability:** We are answerable for our actions and decisions, and are accountable to our clients, the populations they serve, and for achieving objectives and results in accordance with the contract budget and relevant regulations, rules and standards.
- **Neutrality:** We adhere to the act of not taking sides in hostilities or giving material or political support to parties to an armed conflict. Offer redress: We build pathways to enable crisis-affected people and staff to raise complaints, and to respond with appropriate action.
- **Responsibility, including social responsibility:** We are responsible for the welfare of our clients, and our concern for them extends beyond the duration of programs. Aware of the stakes of our commitment and that communities are affected by our actions, we declare to "do no harm", or in very special cases where dilemmas require creative solutions, to "do less harm". We also abide by the standards of social responsibility and thereby contribute to the community building efforts of local populations.
- **Transparency:** We strive for clarity in our intention and our means to reach our goals, as well as consistency between words and actions.
- **Witness:** We report on any suffering or injustice that we witness, as well as on the actions of others that have a negative effect on the well-being of people in need of humanitarian assistance or protection.
- **Protection of people in need:** We vow to respect the dignity, worth, equality, diversity and privacy of people affected by crisis, and to protect their inherent and inalienable rights in their time of greatest need.

DECLARATION OF ADHERENCE TO HUMAN RIGHTS, ACCOUNTABILITY TO AFFECTED POPULATIONS, AND DO-NO-HARM

All members and collaborators of Way to Health are expected to behave and conduct their affairs in accordance with the following commitments:

1. **Respect for human rights and international humanitarian law**, in the professional as well as private sphere.
2. **Accountability to affected populations**: We abide by the Acceptance Strategy, which strengthens the quality of our interventions and consistently binds us to the principles of humanity, neutrality, impartiality, and independence.
3. **Do No Harm**: Be aware of unintended consequences that may result from our engagement in the context and prevent any harm or further suffering of the affected population. Keep all information confidential. Keep the safety and security of affected populations paramount in the design and implementation of programs and services.
4. **Conflict of interest prevention**: Resolution of matters that constitute Conflict of interest before accepting a contract or engaging in a project.
5. **Confidentiality and Non-Disclosure** on the part of both Way to Health and its clients, as they are entrusted with information and data regarding affairs each other's affairs, and therefore must ensure keeping such information between Way to Health and the client only.
6. **Intellectual Property Rights**, particularly crucial due to the original content of Way to Health's services. This right is protected by numerous international treaties.
7. **Protection of vulnerable people** by preventing the following, and reporting on any violations thereof:
 - Sexual exploitation and abuse.
 - Forced/slave labour, in accordance with ILO Conventions nos. 29 and 105.
 - Child labour, in accordance with the UN Convention on the Rights of the Child and ILO Conventions nos. 138, 182 and 79, and ILO Recommendation no. 146.
 - Discrimination against women, in accordance with UN-CEDAW and ILO Conventions nos. 100 and 111.
 - Physical abuse or punishment, including psychological and emotional, or the threat thereof.
 - Corruption, which includes all forms of bribery, favors in kind or in action, and the use of alternative channels or gift bestowed to influence the recipient's conduct.

Scope of the Consolidated Policy

- All staff contracted by Way to Health
- Associated personnel whilst engaged with work or visits related to Way to Health, including but not limited to the following: consultants; volunteers; contractors; program visitors including journalists, celebrities and politicians, and all other collaborators of Way to Health.

Breach of policy

If staff, volunteer, or member who is notified of this Policy does not comply with it, they may face disciplinary action, and suppliers and contractors will have their agreements with Way to Health terminated. Disciplinary action may involve a verbal or written warning or, in serious cases, termination of employment or any engagement with Way to Health Charity Foundation.

Document 2

GBV PREVENTION AND RESPONSE POLICY

Preamble

We are strong believers, practitioners, and advocates of survivor-centered approach in humanitarian programming and developmental assistance. We abide by a model of care and accompanying guidelines that focuses on the needs, desires, and aspirations of the survivor.

Policy Statement

When caring for survivors of sexual abuse and gender-based violence, we ensure strict adherence to respect, confidentiality, safety and security, do no harm, the meaning of which is outline below. Way to Health will not tolerate abuse and exploitation by staff or associated personnel. Any violation, once investigated and proved, shall lead to termination of relations with Way to Health.

- **Respect:** Always uphold the principle that a survivor is a person who possesses inherent human rights, including the right to make decisions for herself. Our role is to help her make informed decisions, but ALWAYS making sure that our actions and behavior are guided by what the survivor wants, NOT what we think she should do. The client has the right to decide whether to speak to other service providers - such as lawyer, medical personnel, psychiatrist, etc. If the client is being referred to another service provider, the counsellor must first meet with those providers and determine the possible benefits that can be gained from the referral. The referral is only a proposal that must be discussed with the client, and if the client agrees, only then will the referral take place. In the case of a child, a parent/legal guardian/or adult caregiver should be consulted, and we should seek their approval. All staff involved in responding to a case of GBV must follow Communication SOPs that foster respect, confidentiality, safety, and do no harm.
- **Confidentiality:** Extreme care is taken with all Information. At all times, confidentiality pertaining to the survivor (or survivors) and their family is strictly protected. This means that information will be shared only with others who need to know about the case in order to provide assistance and intervention, as requested and agreed to by the survivor. The survivor's anonymity is maintained at all times, and all written information about the survivor is kept locked and secure from access by others. All those involved in responding to a case of GBV must follow Confidentiality SOPs and protocols.

- **Safety and security:** In all cases, ensure that the survivor is not placed at risk of further harm by the assailant. The Program Supervisor must provide a risk assessment and regularly brief the team on the security situation in their area of operation and particular to the case of the survivor. If the survivor's living situation is unsafe, measures should be taken to ensure safety. Remember that the survivor may be frightened and may need assurance that she or he is safe. Conduct activities with clients only in locations that have been previously assessed by the GBV team and approved by the Program Supervisor. Strict adherence to policies on information security, social media, no-photo policy, and other data security measures.
- **Do No Harm:** Prevent any further suffering of the survivor. Keep her information confidential. Keep her safety and security paramount in the provision of services. Interviews and direct services must be conducted by trained staff member of the same sex, unless the survivor requests otherwise or if NO OTHER staff member is available. The same staff member remains involved in the case throughout to avoid the survivor being handed from one person to another and having to repeat the same painful information. Validate the survivor's experience in all actions, assuring them that they are not to blame. Exercise SENSITIVITY, DISCRETION, COMPASSION at all times.

Document 3

SAFEGUARDING POLICY

Preamble

Way to Health believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. Way to Health will not tolerate abuse and exploitation by staff or associated personnel.

Purpose

The purpose of this document, in conjunction with Way to Health's Code of Ethics, is to protect people, particularly children, at-risk adults, and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with our NGO. The aim is to safeguard them from harm that may arise from the conduct of staff or personnel associated with Way to Health, as well as the design and implementation of programs and activities.

Policy Statement

This policy will address the following areas of safeguarding [as appropriate]: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

The policy lays out the commitments made by Way to Health, and informs staff and associated personnel of their responsibilities in relation to safeguarding.

Way to Health commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

A. Prevention

Way to Health will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programs and activities in a way that protects people from any risk of harm that may arise from coming into contact with Way to Health. This includes the way in which information about individuals in our programs is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process.

Staff responsibilities

Child safeguarding

Way to Health staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labour or trafficking.

Adult safeguarding

Way to Health staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

Protection from sexual exploitation and abuse

Way to Health staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, Way to Health staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by any Way to Health staff member or associated personnel to the appropriate staff member.

B. Enabling reports

Way to Health will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by Way to Health's Disclosure of Malpractice in the Workplace (Whistleblowing) Policy.

Way to Health will also accept complaints from external sources such as members of the public, partners and official bodies.

How to report a safeguarding concern

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their Safeguarding Focal Point [as appropriate] 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 report to any other appropriate staff member. For example, this could be a senior manager or a member of the Board.

C. Response

Way to Health will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns in Associated Policies).

Way to Health will apply appropriate disciplinary measures to staff found in breach of policy.

Way to Health will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

D. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

Associated policy

GBV Prevention and Response

E. Glossary of Terms

Beneficiary of Assistance

Someone who directly receives goods or services from Way to Health's programs. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation.

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding

Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programs, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialize. Those systems must be survivor-centered and also protect those accused until proven guilty.

Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Document 4

ENVIRONMENTAL POLICY

Principle

Way to Health Charity Foundation has an opportunity to promote and demonstrate high standards of environmental management and stewardship in order to eliminate or at the very least reduce any adverse environmental impact resulting from its operations.

Purpose

Way to Health Charity Foundation aims to: • integrate environmental management into our everyday operations • improve our environmental efficiency, with the aim of sustainability.

Policy Statement

1. Way to Health Charity Foundation actively seeks to minimize and manage the environmental impact of its operations and services.

2. Way to Health Charity Foundation will:

- monitor and comply with all relevant environmental laws and relevant standards and practices
- manage its diverse activities to prevent or minimize pollution and impacts on visual amenity, air, water, land, flora, fauna and cultural and heritage values
- strive to improve resource consumption efficiency and minimize waste generation in our operations and through the life cycle of products consumed and services delivered, including but not limited to recycling of waste products
- investigate and implement mutually beneficial programs of environmental management with governments and external stakeholders
- ensure understanding of environmental requirements and implementation of standards among our employees, suppliers and contractors
- respond to the environmental concerns of our communities, and set and review environmental objectives and targets
- monitor and report our environmental progress, and
- continue to improve our environmental management system and environmental performance.

Document 5

GENDER EQUALITY POLICY

Principle

Way to Health Charity Foundation promotes Gender Analysis, which states that gender is never alone as a cause or driver of conflict, and that it is always intertwined with other social, economic, cultural and political factors. The gender role for women and men in Ukraine is very much influenced by social impositions, traditional practices, and socio-economic situations of the household. These roles are particularly valued for their potential to provide stability and comfort for the family, which are put to extreme test in the recent conflict and humanitarian crisis. Breaking free from rigid traditional roles, most especially for women, is extremely difficult and full of obstacles.

Way to Health Charity Foundation recognizes that displacement and similar crises are a major stressor on gender dynamics. The culturally-rooted, traditionally gendered roles in Ukrainian society get forcibly re-adopted, reconfigured, or redistributed out of the need to survive new and unfamiliar stressors, resulting in additional burdens.

Way to Health Charity Foundation recognizes that the question of dignity and self-worth affect both men and women, though in different ways and magnitudes.

These principles shall manifest in Way to Health's programs and interventions, which shall address gender inequality as a key factor in project design and implementation.

Purpose

Way to Health Charity Foundation actively seeks to:

- integrate gender dimensions into the design of all activities by taking into account the interests and needs of different genders
- promote gender equality in all its operations.

Policy Statement

Way to Health Charity Foundation will:

1. Promote gender equality, reduce inequality risks, and increase protection for family members that are made vulnerable by gender dynamic.
2. Ensure understanding of gender-related issues and implementation of equality standards among staff, volunteers, members, clients, suppliers, and contractors.
3. Empower staff, volunteers, members, and clients to participate in Gender Analysis as a key activity, as this serves to inform Way to Health Charity's Policy on Gender Equality.

4. Empower and monitor staff, volunteers, members, and clients to promote gender equality in all their engagements with Way to Health Charity.