

# **PROGRAM FOR ACCESSIBLE HEALTH COMMUNICATION AND EDUCATION (PACE)**

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## **STANDARDS OF CONDUCT-EXTRACT**

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## STANDARDS OF CONDUCT

### 16.1 Rationale:

PACE's actions and the behavior of its employee have an impact on the livelihood of many people, the local environment and the greater community. It is therefore essential that all stakeholders have confidence that PACE maintains the highest standards of conduct in all matters financial and non-financial. The purpose of this code of conduct is to provide a clear framework within which PACE employee are expected to conduct themselves. This code covers some of the most important issues relating to personal conduct, expected standards and behavior guidelines, however, it is not intended to be exhaustive in scope.

All employees must comply with the provisions of this code. Breaches may result in disciplinary action up to and including summary dismissal.

- Theft or inappropriate removal or possession of PACE property.
- Falsification of timekeeping records or any other documents.
- Untruthfulness about personal work history, skills or training
- Working under the influence of alcohol or illegal drugs
- Possession, distribution, sale, transfer, or use of alcohol or illegal drugs in the workplace.
- Fighting or threatening violence in the workplace;
- Negligence or improper conduct leading to damage of organization-owned or customer-owned property.
- Insubordination or other disrespectful conduct;
- Violation of safety or health rules.
- Smoking in the workplace;
- Sexual or other unlawful or unwelcome harassment
- Excessive absenteeism or any absence without notice.
- Unauthorized use of organization-owned equipment.
- Using PACE equipment for purposes other than business.
- Unauthorized disclosure of business "secrets" or confidential information.
- Misrepresentations of PACE to a customer, a prospective customer, the general public or an employee.
- Violation of personnel policies.
- Failure to satisfactorily perform assigned duties.
- Buying and selling persona items during official hours
- Gambling

## 17. STANDARD OF PERSONAL BEHAVIOR

### 17.1 Harassment

PACE believes that all employees have a right to work free of any form of harassment. Harassment is a zero-tolerance offence at PACE. The purpose of this policy is to protect employees from workplace harassment and to provide accessible recourse when harassment does occur.

PACE shall treat all acts of harassment as a violation of the accepted code of behavior in the workplace. Instances of harassment, if proven to have taken place, will be treated as gross misconduct and a breach of discipline.

### 17.2 Sexual Harassment Policy

PACE does not tolerate any form of sexual harassment and will deal with proven cases strictly including reporting the matter to the Labor Commissioner for action.

Definition: is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment. An employee is deemed to have been sexually harassed if the Manager or any representative of PACE or a Co-worker:

1. Directly or indirectly requests the employee for sexual intercourse, sexual contact or any form of sexual activity that contains an implied or express:
  - a. Promise of preferential treatment in employment.
  - b. Threat of detrimental treatment in employment; or
  - c. Threat about the present or future employment status of the employee
  - d. Uses language whether written or spoken of a sexual nature.
  - e. Shows physical behavior of a sexual nature which directly or indirectly subjects the employee to behavior that is unwelcome or offensive to that employee and that by its nature has a detrimental effect on that employee's employment, job performance or job satisfaction.

Sexual harassment can include, but is not limited to:

- a) Verbal harassment: Any of the following, whether conveyed orally or in writing, offensive jokes or remarks, abusive, threatening or insulting words, offensive flirtations,

lewd comments about appearance, threat of dismissal or loss of promotion for refusal to action inappropriate requests.

- b) Physical actions: Any unwanted touching/body contact – pinching or patting, threat of, or actual, assault/violence, offensive or threatening gestures, sexual advances, stalking, rape or attempted rape
- c) Inappropriate displays: Sexually suggestive objects or pictures, sexually graphic commentaries, suggestive or insulting sounds, leering, or obscene gestures.
- d) Third Party Harassment is defined as behavior that is unwelcome to the individuals who see or hear it even though it is not directed to them. It is also defined as harassment from third parties such as donors, partners, vendors who are non-employees.

### **17.3 Reporting and Investigation of Complaints**

Any employee, who becomes aware of harassment or any sexually inappropriate conduct, whether affecting themselves or others, has an obligation to report this to his or her supervisor, to a member of the HR & Admin department, or to any other member of PACE management. Employees are strongly urged to report harassment before it becomes severe or pervasive.

Any supervisor or manager who receives a complaint of possible sexual or other prohibited harassment is required to promptly contact the HR & Admin Manager so that an investigation may be initiated in a timely manner.

All complaints will be investigated promptly and thoroughly. Where appropriate, PACE may use outside experts to investigate a complaint of harassment. PACE will make every effort to protect the confidentiality of employees lodging complaints or participating in investigations under this policy. However, PACE cannot guarantee complete confidentiality, since an effective investigation may not be possible without revealing certain information to the alleged harasser and/or potential witnesses.

No employee will suffer retaliation for reports of harassment if made in good faith. PACE encourages any employee to bring questions regarding this policy and its implementation to the Head of Human Resources.

If harassment is proven, disciplinary procedures shall be implemented against the offender.

### **17.4 False Allegations:**

It is a violation of this policy for anyone knowingly to make false accusations of harassment. Failure to prove a claim of harassment is not equivalent to a false allegation. Those who are falsely accused may avail their complaint to the ED who shall conduct an investigation into the matter and have the same resolved in a set out in the disciplinary procedures.

All the above are applied in line with the existing employee policies and procedures as well as the Employment Act.

### **17.5 Unique Nature of PACE's Work**

Due to the unique nature of PACE's work marketing condoms and other contraceptives and educating people about sexual and reproductive matters, employees who join PACE must understand and accept that sexually explicit discussions are an integral part of accomplishing our mission. Appropriate oral and written communications conducted in connection with PACE's work will not be considered sexual harassment. By accepting employment at PACE each employee acknowledges and accepts this special work condition.

### **17.6 Close Personal Relationships**

PACE seeks to avoid potential internal conflicts of interest posed by close personal relationships between employees. "Close personal relationships" include marriage, or other committed relationships, close familial relationships (i.e., parent-child, sibling), or consensual romantic or sexual relationships. To ensure that close personal relationships between employees do not influence decisions with respect to hiring, evaluation, compensation, assignment, training, promotion, discipline, termination, or any other aspect of employment, any employee engaged in a close personal relationship with another PACE employee, the employee is responsible for disclosing this in writing to the HR & Admin Manager. Each participant in a close personal relationship is also responsible for notifying the HR & Admin Manager in writing in the event the relationship ends. When informed of a close personal relationship in accordance with this policy, the HR & Admin Manager shall consult with the appropriate parties and recommend steps to address any resulting workplace issues. Such steps may include reassignment of duties, transfer, or change in reporting relationship. At a minimum, steps will be taken to ensure that a manager will no longer supervise or participate in decisions, either directly or indirectly, that may affect another employee with whom he or she has a close personal relationship.

### **17.7 Telephone:**

Employees are expected to use their good judgment when making calls.

The use of PACE telephones for personal local calls should be kept to the barest minimum and must not interfere with the employee's work or office operations.



Personal international calls are not allowed on PACE phones. All official international calls must be logged/ recorded by the Administrative Assistant.

#### **17.8 Misuse of drugs and Alcohol:**

PACE employees are expected to come to work able to perform their duties productively and safely. Use of illegal drugs (including misuse of prescription medication) or alcohol on PACE premises or during work hours or arriving at work under the influence of illegal drugs or alcohol is strictly prohibited. The manufacture, distribution, possession, sale, or purchase of controlled substances of abuse on PACE property is prohibited.

Except for PACE sponsored events, consumption of beverages containing alcohol on PACE premises is strictly forbidden.

PACE is proud of the unique dedication and spirit of its employees and encourages opportunities for informal socializing and celebration of successes. At the same time, we take very seriously our responsibility to protect the safety of our employees, guests, and others with whom they come in contact.

PACE reserves the right to require any employee to submit to drug or alcohol testing at any time during normal business hours.

#### **17.9 Tobacco Products:**

The use of tobacco products is not permitted anywhere on the organization's premises except in authorized and designated locations. The designated smoking areas are located outside the gate. Employees must follow all rules posted in designated smoking areas and adhere to all policies associated with this policy.

#### **17.10 Internet Use:**

PACE employees are allowed use of the Internet and e-mail when necessary, to serve our customers and conduct the organization's business. Employees may use the Internet when appropriate to access information needed to conduct business of the organization. Employees may use e-mail when appropriate for PACE business correspondence.

Use of the Internet must not disrupt operation of the PACE computer network or interfere with an employee's productivity. Employees are responsible for using the Internet in a manner that is ethical and lawful. Internet messages are public and not private. PACE reserves the right to access and monitor all files and messages on its systems.

#### **17.11 Personal Visitors:**

Employees should use discretion when inviting personal visitors to the workplace. Under no circumstances will personal visitors be allowed use PACE resources (e.g. telephone, photocopier, fax, computers etc.).

#### **17.12 Instructions:**

PACE expects employees to follow all reasonable rules and instructions given by those supervising or managing their activities and/or work areas.

#### **17.13 Malicious Gossip and Rumour Mongering:**

Engaging in the spread of malicious gossip, rumour mongering and or similar acts of caricature that are aimed at disparaging an individual or group of staff members or whip up sentiments against management or authority is not permitted. Such acts are grounds for disciplinary action.

#### **17.14 Conduct outside Work:**

PACE does not seek to dictate how employees conduct themselves in their personal lives outside of their work. However, unlawful, anti-social or conduct which may jeopardise PACE's reputation, will be dealt with via the disciplinary procedure.

#### **17.15 Gambling:**

Gambling activities must not be conducted on PACE premises, unless (at the discretion of the Line Manager) they are office raffles, for charitable purposes, or national lottery syndicates, etc

#### **17.16 Hawkers/Vendors:**

Hawkers are not allowed on PACE premises. They should be immediately reported to security officials.

#### **17.17 Political Activity:**

Since PACE is a non-political organization, all PACE employees should avoid engaging in any political activity at work or during the hours of service. Employees should concentrate on the work at hand and on maintaining good working relationships both within the organization and with the community.

#### **17.18 Workplace Violence**

PACE is committed to providing a safe workplace for all employees. It is the policy of PACE that workplace violence in any form is unacceptable. Any form of violence by an employee against another employee, or visitor to PACE, including but not limited to physical attack, intimidation, threat or property damage, will be cause for disciplinary action up to and including dismissal. This conduct may also result in criminal prosecution.

An employee who believes that s/he has been the target of workplace violence must report this to the police and his/her Line Manager or the Head of Human Resources.

Employees that witness incidents of workplace violence should file a report of alleged workplace violence with the appropriate Line Manager and with the Head of Human Resources as soon as possible. In emergency situations, call the police; UTL-Landline 999 or MTN Mobile 112 or other police emergence lines.

Supervisors are required to respond in a prompt and effective manner either when notified of an alleged incident of workplace violence, or when they witness workplace violence. They are required to contact the Head of Human Resources for guidance and assistance in handling such situations and promptly complete a Violence Report Form.

#### **17.19 Reports and Records:**

When preparing reports, budgets, statements, invoices, time sheets or other documentation for government bodies, donors, or contracting agencies, employees must see to it that information provided is accurate, complete, clear, and presented in a manner designed to enlighten and not to mislead. Under no circumstances may an employee make a claim for payment for amounts not properly due to PACE for work performed or goods or services provided, or any other false statement, representation or certification on behalf of PACE, in either written or oral form. This includes falsification of time sheets or other time records, cost reports, expense reports, pricing proposals, certifications relating to cost or pricing data, or requests for payment.

PACE employees responsible for financial and/or personnel recordkeeping must see to it that such records are developed and maintained carefully and accurately in accordance with all applicable legal requirements and PACE procedures, and that PACE funds are scrupulously expended and accounted for. Access to such records should be limited to those employees who require it to carry out their job responsibilities.

Documents related in any way to an ongoing or potential investigation of PACE by a government agency or to any other official proceeding must not be destroyed, discarded or altered.

PACE records and documents are not to be removed from PACE premises without the express prior permission of the employee's line manager.

#### **17.20 Audits and Investigations:**

Employees are expected to cooperate fully with all authorized investigations, including internal audits and any external audits by, or required by, PACE donors, government agencies, or related bodies, and must never lie to or mislead an investigator or obstruct the collection of information relating to an investigation or a legal proceeding. Employees must always consult in advance with their supervisors and/or the Head of Internal Audit to make sure they understand the scope of their responsibilities in connection with audits or investigations.

#### **17.21 Dressing and Appearance**

PACE does not mandate a formal dress code, except for employees provided with uniform and / or protective clothing. In order to maintain PACE's professional image both internally and with the public, employees are always expected to dress in appropriate professional attire with sensitivity towards client perceptions.

PACE has a dress down day each Friday, when smart casual attire is permitted. Every employee conveys the first line image of the organization that he/she works for. Consider yourself a business card for the organization and yourself.

## **18. CONFLICT OF INTEREST**

### **18.1 Rationale:**

The conflict-of-interest policy is designed to help PACE employees identify situations that present potential conflicts of interest. The policy complements other PACE policies to prevent the personal interest of employees from interfering with the performance of their duties to, or result in personal financial gain on the part of such employees at the expense of PACE and its stakeholders.

Each employee should at all times act in the best interest of PACE, always using good judgment in the circumstances presented to him or her. Good judgment by employees is essential, as no list of rules can provide for all the possible circumstances that may arise.

### **18.2 Definition:**

A "Conflict of Interest" is defined as an action or the actual or possible lack of integrity in decision-making process that results in inappropriate personal financial gain on the part of the employee or persons in authority at the expense of PACE and its stakeholders.

Employees should avoid situations in which their personal financial or other interests could conflict with, or even appear to conflict with, the interests of PACE or their responsibilities to conduct PACE's business fairly, impartially, and in compliance with this Policy. Conflicts of interest arise when an individual's position or responsibilities at PACE present an opportunity for personal gain or profit for that individual or someone, they are close with, or where the employee's interests are otherwise inconsistent with those of PACE. Some apparent conflicts of interest may be resolved through disclosures and authorized waivers. A conflict of interest may arise in any number of situations and it is impossible to describe each and every instance. While not exhaustive, some areas of potential conflict of interest are addressed below:

### **18.3 Absolute Prohibition:**

An employee shall not participate in the selection, award, or administration of a PACE contract, subcontract, grant, sub grant, loan or other funding mechanism if the employee, a member of his/her immediate family, or business associate has any current or prospective interest, financial or otherwise, including current or prospective employment, in an entity being considered or selected for an award.

### **18.4 Other Potential Financial/ Representational Conflicts:**

If an employee, spouse, domestic partner or any other member of an employee's immediate family has or is considering a financial or organizational interest (as an employee, consultant, business partner, investor, borrower, lender, beneficiary, or paid or unpaid board member or trustee) in a PACE competitor, contractor, consulting firm, customer, vendor, donor or funding recipient, the employee should promptly disclose this interest to the Executive Director. If PACE determines that the interest disclosed presents an actual or potential conflict with the interests of PACE, the employee may be directed to take appropriate steps to avert or resolve such conflict.

#### **18.5 Outside employment/ Board membership:**

PACE shall not tolerate outside employment. An employee of PACE who wishes to (i) perform services for, or accept employment from, anyone other than PACE, (ii) engage in any other business or professional activity with an outside entity, or (iii) accept a significant leadership position, including board membership, in another organization (with or without compensation), should declare to their supervisor or the Executive Director in writing to avoid conflict of interest. **Employees shall not use PACE time or resources to further non-PACE business.** At no time may an employee's outside employment or other activity (i) interfere in any way with the fulfillment of the employee's duties to PACE; (ii) adversely affect the quality of the employee's work; (iii) compete in any way with PACE; (iv) compromise PACE's reputation; or (v) imply sponsorship or support by PACE of an outside affiliation. An employee who violates this provision shall be subject to disciplinary action.

#### **18.6 Use of Proprietary Material:**

Employees may not use any PACE property or proprietary information learned in the course of employment at PACE for personal financial gain or to compete with PACE.

#### **18.7 Organizational Conflicts**

Employees should be mindful of, and comply with, PACE and Uganda Government rules designed to prevent unfair competitive advantage in bids for government contracts. These include restrictions on:

Participation in a competition by an organization under contract to design the scope of work for that competition; and/or

Use of contractor bid or proposal information or government source selection information not available to all competitors and/or obtained from a government official or otherwise without proper authorization. Specifically, employees are prohibited from soliciting, receiving or

disclosing, directly or indirectly “source selection” information other than with proper authorization and through official means or methods. “Source selection” information is information not previously made available to the public that is prepared for use by an agency evaluating a bid or proposal, such as listings of offers and prices, identification of bidders prior to bid openings, technical evaluation plans, technical evaluations of competing proposals, competitive range determinations, and evaluations and recommendations. Employees are also prohibited from soliciting, receiving or disclosing, directly or indirectly, any information submitted by a prospective contractor to a government agency in connection with a bid or proposal, including cost or pricing data, indirect costs and direct labor rates, proprietary information, and any other information marked by a contractor as “contractor bid or proposal information.”

### **18.8 Gifts and Payments**

All forms of bribery and kickbacks are illegal and strictly prohibited. Employees may not offer, provide or accept any form of payment, including monetary compensation, credit, gifts, gratuities, favors, entertainment, meals, transportation, lodging, services, facilities or any other thing of value, directly or indirectly, as a “kickback” to influence, or be influenced by, any person or entity for the purpose of obtaining favorable treatment in connection with a contract, subcontract, grant, sub grant or any other benefit to or from PACE. Any employee who is asked to make or accept a prohibited kickback or bribe should report this immediately to his/ her supervisor.

Employees may not give or accept money, credit, gifts, gratuities, favors, entertainment, meals, transportation, lodging, services, facilities or anything else of value to or from parties to current funding agreements with PACE, other than gifts of nominal value not exceeding \$20 per source per occasion, or \$100 to or from any single source in a calendar year, without prior approval from an employee’s supervisor. The onus is on each individual employee to keep track of such gifts up to the limits indicated and to provide adequate proof if required.

### **18.9 Certification and disclosure:**

Employee shall be required to comprehend this Policy and acknowledge in writing that he or she has done so.

All employees shall complete a conflict-of-interest form/annual disclosure statement, a copy of which shall be kept in their personnel files.

Failure by the employee to disclose as required by the above provisions on conflict of interest shall be subject to disciplinary action.

## **19. WHISTLE BLOWER GUIDELINES**

### **19.1 Rationale**

PACE has a high reputation among donors, authorities, beneficiaries and stakeholders for its professional work and integrity. However, PACE faces the risk of activities going wrong or unknowingly harboring violations/ malpractice/ wrongdoing. PACE is committed to preventing such wrongdoing especially in forms of fraud, corruption, abuse of power, harassment and conflict of interest.

PACE requires its employees i.e directors, managers, officers, temporary employees, interns and consultants to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of PACE must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

PACE encourages its employees, beneficiaries, partners and other stakeholders to report wrongdoing/ violations to help protect the organization and donor assets entrusted to PACE's care. In light of this, PACE must maintain an environment where it can receive, retain, and address concerns and complaints.

PACE has a Whistleblower policy (*Annex X*) that provides a mechanism by which concerns may be raised free of discrimination, retaliation, or harassment.

### **19.2 Definitions**

#### **19.2.1 Whistle-blower**

A director, manager, employee, temporary employee, partner of the organization or member of public who wishes to report conduct they believe is in breach of the relevant policies and procedures, laws and regulations, ethical norms, and where the individual perceives a need to avail themselves of protection against reprisal for having made the report. A whistleblower may or may not elect to remain anonymous.

#### **19.2.2 Potential Violation**

For the purpose of this guideline, may include but not limited to Internal accounting controls, theft; mismanagement of donor assets; fraud, corruption, criminal offences, non-disclosure of



conflict of interest, abuse of power, harassment, bullying, sexual harassment, sexual exploitation, sexual abuse and unethical conduct.

### **19.2.3 Fraud**

Although there is no precise legal definition of fraud, the term is used to describe such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Fraud can occur anywhere within and outside PACE and can present itself not simply as financial or financially motivated but covers areas including financial, reputational, employment and staff. It is a deliberate act or failure to act with the intention of obtaining an unauthorized benefit.

### **19.2.4 Malicious Allegations**

Allegations made with reckless disregard for their truth or falsity. Individuals making such allegations will be subject to organizational disciplinary action if established that they were made in bad faith.

### **19.3 Acting in Good Faith:**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as malicious or baseless allegations. The individuals will be subject to disciplinary action for such allegations in line with the Employee manual.

### **19.4 Confidentiality:**

Violations or suspected violations may be submitted on a confidential basis by the Whistleblower or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **19.5 No Retaliation:**

No director, manager, officer or employee who in good faith reports a potential violation shall suffer harassment, retaliation or adverse employment consequence. An employee who

retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within PACE prior to seeking resolution outside PACE.

### **19.6 Reporting Potential Violations**

PACE has put in place a reporting mechanism that is embedded in the Whistleblower policy (*Annex X*). However, PACE has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with your supervisor's supervisor, someone in the Human Resources Department or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected ethics violations to the PACE's Internal Audit unit, who have the responsibility to investigate all reported violations.

### **19.7 Receiving and Addressing Reports**

#### **19.7.1 Handling of Reported Violations**

PACE will acknowledge in writing receipt of the report (unless complainant is anonymous) and will undertake to investigate the potential violation promptly. The Internal Audit unit will report in writing the potential violations and outcomes of investigations to the PACE Executive Director in due course. Should the gravity of a potential violation merit, the Executive Director will advise the Board of the outcome after investigation at the next regularly scheduled board meeting.

Reasonable care should be taken in dealing with a potential violation to avoid:

- Baseless allegations.
- Premature notice to persons suspected of a potential violation and/or disclosure of the potential violation to others not involved with the investigation.
- Violations of a person's rights under law.
- Should not discuss the case with anyone other than the Executive Director or a duly authorized law enforcement officer.

- should direct all inquiries from any attorney retained by the suspected individual to the Legal Counsel.
- Should direct all inquiries from the media to PACE’s Public Relations/Executive Director, or in the event that they cannot be contacted, to the Office of the Legal Counsel.

### **19.7.2 Internal Audit unit**

PACE’s Internal Audit unit is responsible for investigating and resolving all reported complaints and allegations concerning violations and shall advise the Executive Director and/or the audit committee. The Internal Audit Manager has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on compliance activity.

The Executive Director may designate an additional Officer where the circumstances of the reported violation require this to be done. The need for this will be determined by Executive Director. The designated ‘Officer’ will be required to report directly to the Executive Director.

### **19.7.3 Accounting and Auditing Matters**

The audit committee of the board of directors shall address all reported concerns or complaints regarding organizational accounting practices, internal controls or auditing. The Internal Audit Manager shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

## **20. CHILD PROTECTION POLICY**

### **20.1 Rationale**

In accordance with Article 19 of the United Nations Convention on the Rights of the child (UNCRC), PACE recognizes the right of all children to be protected from all forms of abuse and exploitation and that neither abuse nor exploitation of children is acceptable. PACE further recognizes that, as an organization working with children; it has a responsibility to protect children within its care from harm. PACE employees and other personnel are prohibited from engaging in any form of child abuse, exploitation or neglect.

The purpose of this Child Protection Policy is to ensure that PACE, as an organization, is safe for children who benefit from PACE programs either directly or through providers or other persons it works with to deliver products and services. This Policy is also intended to comply with USAID requirements with respect to Child Safeguarding. PACE will do all it can to prevent abuse, exploitation and neglect of children, including minimizing such risks by creating mechanisms to prevent, detect, report and respond to abuse, exploitation or neglect in a timely and appropriate manner. Accordingly, this policy defines a framework for implementing child protection and identifies who shall be responsible for implementing the policy in accordance with organizational guidelines.

### **20.2 Policy Guidelines and Procedures:**

Guidelines and procedures for implementation of the policy shall address key areas essential to a robust child protection policy including, but not limited to:

### **20.3 Detection, Reporting and Response:**

PACE is committed to ensuring that the detection, reporting of and response to allegations of child abuse, exploitation and neglect is guided by the principle of “best interest of the child” including but not limited to ensuring that (a) all children involved in PACE projects are aware of the procedures of detecting and reporting a concern; (b) all staff are aware of how to detect child abuse, exploitation, neglect and reporting procedures; and (c) all child protection policy focal points are trained on response procedures.

### **20.4 Ramifications of Misconduct:**

PACE is committed to ensuring timely and fair investigations and informed decision making regarding disciplinary action up to and including dismissal, ensuring that investigations are

prompt and follow standard procedures for follow up and resolution. Violations of the child protection policy by staff will result in disciplinary action.

#### **20.5 Safety and Security:**

PACE is committed to ensuring staff preparedness in the event of an accident or other harmful event that involves children. Head quarter Office and regional offices shall maintain a current list of contact details of relevant services for referral. Staff training for evacuation procedures in the event of a fire, explosion, accident or other event shall provide specifically for the treatment and protection of children.

#### **20.6 Recruitment:**

Existing recruitment and hiring procedures will be reviewed to ensure that child protection is an essential element thereof. All employment listings shall reference the Child Protection Policy. Background checks and references are mandatory for all employees. Orientation of new employees will include reference to PACE's commitment to child protection, this policy and related materials.

#### **20.7 Training and Implementation:**

PACE is committed to creating an organizational atmosphere that encourages opportunities to question and learn about child protection. Trainings and sensitizations of our staff and collaborators in child protection will be provided by the Child Protection Officer in our areas of operation at least one child protection training every two years.

#### **20.8 Information and Communication:**

PACE is committed to ensuring appropriate use of words and images of children. PACE communication guidelines, including provisions for the protection of child beneficiaries shall be distributed to all journalists, photographers and visitors to PACE programs. PACE staff and visitors shall adhere to Child Survival Communication guidelines.

#### **20.9 Monitoring and Review:**

PACE is committed to ensuring a clearly defined management structure for implementation of this child protection policy. Accordingly, PACE shall have a child protection focal person Head of People and Culture for staff. For our beneficiaries in the community, the focal person will be Head of Programs. This focal person shall periodically review the effectiveness of the Child Protection Policy and provide recommendations for changes where needed.

## 21. HUMAN RIGHTS AND GENDER

### 21.1 Rationale

The universal declaration of human rights outlines the rights and freedoms that belong to every person from birth till death. These basic rights are based on shared values like dignity, fairness, equality, respect and independence. PACE recognizes the right of all individuals to be protected and PACE employees and other personnel are prohibited from engaging in any form of human rights abuse.

PACE shall ensure that all its employees regardless of gender have equitable access to, and benefit from PACE's resources, opportunities and rewards. And, have equal participation in decision making.

## 22. PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA)

### 22.1 Rationale

The policy is meant to safeguard the beneficiaries of PACE from acts of sexual exploitation and abuse (SEA). These could be direct or indirect beneficiaries of PACE programs and include adults, children and the wider community in which PACE operates.

PACE expects high standards from its staff and in the context of the PSEA policy, “staff” shall refer to employees, consultants, volunteers, and interns; its partners, suppliers, vendors and contractors against sexual exploitation and abuse including taking measures that prohibit SEA in their professional and personal lives.

### 22.2 Definitions

#### 22.2.1 Sexual Exploitation

Actual or attempted abuse of position of vulnerability, power differential or trust for sexual purposes including but not limited to profiting monetarily, socially, or politically as an incentive or form of coercion. (IASC<sup>1</sup>)

#### 22.2.2 Sexual Abuse

Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes inappropriate touching, sexual assault, and rape. It may also include threatened or actual nonphysical intrusion (unwanted and/or uninvited exposure to pornography, texts, images, and so on, the sharing of images, texts and so on, demands for sexualized photographs etc.). (IASC)

### 22.3 Six principles of PSEA

- Acts of SEA constitute gross misconduct and are grounds for termination of employment.
- Sexual activity with persons under the age of 18 is prohibited.
- Exchange of money, employment, goods, or services for sex is prohibited.
- Sexual relationships between PACE staff and beneficiaries (Sarah) are prohibited.

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<sup>1</sup> Inter-Agency Standing Committee is an inter-agency forum of UN and non-UN humanitarian partners founded in 1992, to strengthen humanitarian assistance. The Inter-Agency Standing Committee is committed to protecting affected populations from sexual exploitation and abuse within all the humanitarian response operations.

- PACE staff must report concerns regarding SEA by fellow staff.
- PACE staff especially those in leadership position are obliged to create and maintain an environment that prevents SEA.

#### 22.4 PACE's mandate towards PSEA

**Awareness:** Ensuring that all staff, representatives and third parties are aware of the high standards of behavior and conduct expected of them to protect **Sarah** from any form of sexual abuse and exploitation in their private and working lives.

**Prevention:** Ensuring, through awareness and good practice, that staff, representatives and third parties of PACE minimize the risks of any form of sexual exploitation and abuse, including but by no means limited to conducting relevant vetting and background checks of staff as part of their recruitment process.

**Reporting:** Ensuring that all staff, representatives and third parties of PACE are clear on what steps to take where suspicions or concerns arise regarding allegations of sexual exploitation or abuse.

**Responding:** Ensuring that immediate action is taken to identify and address reports of sexual exploitation and abuse and ensure the safety and well-being of the person being sexually exploited or abused. Victims should receive appropriate assistance in form of medical care, legal services, psychological and social care.

#### 22.5 Zero Tolerance

At PACE, we have a culture of zero tolerance to all forms of abuse and mistreatment, including Sexual Exploitation and Abuse, Harassment, Intimidation and Bullying. This means that every single concern is fully responded to and where necessary prompt action (including investigating and taking disciplinary action, if applicable) is taken. It means that we will hold our people to account against the same standards and subject them to the same processes, as everyone else regardless of their position or reputation within the organization.

#### 22.6 Reporting



It is the obligation of all PACE staff and third parties to raise any concerns or suspicions they have, actual or perceived, of any breach of the PSEA Policy by any colleague or client. This should be done through:

- PACE's internal and external mechanism as laid out in the Whistleblowing Policy. 080-011-3238-Tollfree  
[www.pace.ethicspoint.com](http://www.pace.ethicspoint.com)  
[safeguarding@pace.org.ug](mailto:safeguarding@pace.org.ug)  
[executive@pace.org.ug](mailto:executive@pace.org.ug)

OR

- PSEA focal person

OR

- Immediate supervisor or the supervisor's supervisor should the concern be against the supervisor.

OR

- To a senior manager with whom they feel comfortable

When made aware of an alleged breach of the PACE PSEA Policy, PACE shall:

- Take appropriate action to the best of its capacity to protect persons from retaliation when allegations of sexual exploitation and abuse are made in good faith.
- Investigate allegations of sexual exploitation and abuse involving PACE staff and related personnel in a timely and professional manner, and to the best of its capacity encourage all designated stakeholders to do the same.
- Inform donors and relevant regulatory authorities as required by agreements and law, respectively.
- Use appropriate interviewing practices with complainants and witnesses, particularly with children. This may include engaging professional investigators or securing investigative expertise as appropriate.
- Take swift and appropriate action, including legal action when required, against employees and related personnel who commit sexual exploitation and/or abuse.

- Take swift and appropriate action against those who were aware of such abuse/exploitation but did not report it.
- Support survivors of SEA, including but not limited to medical assistance, if required.

All PACE staff shall be made aware of the reporting mechanisms for PSEA by ensuring that reporting lines on how to raise concerns are displayed in an accessible location in all PACE offices. This display must contain the contacts of all focal points, the internal and external whistleblowing contacts and the complaints response mechanism.