



Protection Policy against Abuse of Power (PPAP)

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1) Introduction

"Freedom [...] only exists when there is no abuse of power" *Montesquieu*

The Association François-Xavier Bagnoud – FXB International (FXB) works in rural and peri-urban areas in its countries of intervention. These are marginalized and/or isolated areas where particularly vulnerable people live¹, both economically and socially. A grain of sand in their life path can quickly turn their situation upside down: food security, health, etc. The aim of setting up development programs and projects is to improve their living conditions and make them more resilient.

In this context of fragility, it is significant to be aware of the power relationships that govern the various relationships and to avoid any abuse. The Protection Policy against Abuse of Power (PPAP) is FXB's reference document in this regard. Its Ethical Charter² and its Institutional Strategy inspire this PPAP. It aims to detect abuse of power and mistreatment, to function as an early warning system and to identify structural dysfunctions. The actions of all those involved in the implementation of programs or projects must not cause harm to the beneficiaries. The definition of abuse is that of the Council of Europe: Abuse is characterized by *"any act or omission committed by a person if it affects the life, physical or psychological integrity or freedom of another person, or seriously compromises the development of his/her personality and/or harms his/her financial security"*.

The establishment of a complaint mechanism where victims or witnesses of malpractice can come forward with complete discretion accompanies this PPAP. An investigation committee will deal with each case according to a detailed procedure to clarify the situation and enact sanctions according to its findings. We have zero tolerance for all forms of abuse of power, and we enshrine the principle of accountability for all and the principle of reporting.

The Protection Policy against Abuse of Power (PPAP) will evolve over time and in the light of experience. It is a document that will be adjusted, taking into account the opinions and criticisms of our strategic partners so that it is operational both in Switzerland and within our countries of intervention. It will be reviewed annually, and a report will be produced on the activities carried out in the field while guaranteeing anonymity.

Accountability to the people we serve, as well as to donors and funders, requires us to put in place the necessary mechanisms to ensure that our actions are carried out in a caring environment. We have a moral duty to provide the means to denounce inappropriate behavior.

¹ According to the concept of "Leave no one behind (LNOB)", which is the central and transformative promise of the 2030 Agenda for Sustainable Development and its Sustainable Development Goals (SDGs)

² <https://fxb.org/app/uploads/2020/06/FXB-Ethics-Charter.pdf>

2) Being exemplary

Those involved with FXB must carry out all actions following the Charter and its seven core values, according to the acronym DIGNITY, which is part of FXB's tagline: **Ending Poverty, Restoring Dignity** to raise children otherwise adrift.

- D** **Defending fundamental human rights:** FXB is committed to human rights promotion and defense, with particular attention on the rights of children and women and the prevention of all forms of violence and insecurity against them.
- I** **Importance of the primacy of the family:** With a vision of *Preventing the legacy of poverty*, FXB recognizes the crucial importance of the functionality of extended families in achieving child well-being.
- G** **Governance:** FXB applies the 5 pillars of good governance recognized by the United Nations Human Rights Council³: transparency, responsibility, accountability, participation and responsiveness to the needs of the people.
- N** **Leaving No One Behind:** In the 2030 Agenda for the Sustainable Development Goals (SDGs) as well as in the SDC's orientation⁴, the international community commits to leaving no one behind. Since 1989, FXB's premise has been to intervene for forgotten causes, forgotten people, in forgotten countries - starting with children.
- I** **Impartiality:** FXB, and more broadly all its collaborators and partners, do not make any distinction based on nationality, ethnicity, gender, religion, social class or political opinion. FXB's work is guided solely by the needs of individuals and communities.
- T** **Transition to self-sufficiency and self-determination:** FXB provides the tools and support necessary to accompany participants in its projects and programs towards economic and social autonomy.
- E** **Empowerment:** FXB's projects and programs aim to empower women and build the capacity to act and develop of the communities it supports.

FXB requires **irreproachable behavior** from all those involved in its activities: FXB employees, committee members, strategic partners, people commissioned to carry out a project, local partners, beneficiaries and volunteers. These people must embody FXB's values in order to create a genuine organizational culture of trust and respect. Everyone's personal ethics are called upon. This exemplary behavior includes an absolute ban on the use of alcohol or drugs while carrying out any FXB-related activity. Definitions, risk reduction measures and clear

³ <https://www.ohchr.org/fr/good-governance/about-good-governance>

⁴ www.shareweb.ch/site/Poverty-Wellbeing/leave-no-one-behind/Shared%20Documents/sdc-guidance-leave-no-one-behind_FR.pdf

processes outlined in the Protection Policy against Abuse of Power (PPAP) provide guidance to those involved in our activities.

If, despite all precautions, an act of abuse of power is committed, it must be reported as soon as possible to the reference persons or through the complaints mechanism to the PPAP manager. A person who does not report an act is considered an accomplice and therefore bears some responsibility. Exemplary behavior that builds trust with partners and beneficiaries is crucial in contexts where economic, social and psychological vulnerability is omnipresent. The well-being of the beneficiaries is the highest priority.

3) Types of abuse of power and mechanisms

3.1) Zero Tolerance to Sexual Exploitation, Abuse and Harassment (PSEAH)

a. Definition

Sexual exploitation means taking advantage, or attempting to take advantage, of a person's vulnerability or position of unequal power or trust in order to **obtain sexual favors**, including the promise of money or other social, economic or political benefits⁵.

Sexual abuse means any **physical harm of a sexual nature** committed by force, coercion or unequal relationship, as well as the threat of such harm⁶.

Sexual harassment is any **unwelcome sexual advance**, request for sexual favors, or verbal or physical attitude with sexual connotations towards a person or group of persons⁷. In such a situation, we consider the victim's perspective (perception and feeling). It might be a single incident or a pattern of malicious behavior.

b. People involved

- FXB International employees
- Members of the Committee
- Staff of the strategic partners
- Persons and/or organizations commissioned to carry out a project
- Sub-grantees
- Partners
- Beneficiaries
- Volunteers

c. Sexual behavior

Inappropriate sexual behavior - be it abuse, exploitation or sexual harassment - hinders the smooth running of the organization, and victims suffer from this climate of intimidation, hostility, offence and humiliation. Individual dignity is not respected, which is in opposition to

⁵ This includes human trafficking and prostitution.

⁶ This includes sexual slavery, pornography, child abuse and sexual assault.

⁷ This includes verbal comments, such as remarks about a staff member's appearance, and sexist jokes; non-verbal acts, such as displaying sexual images, staring, inappropriate gestures and attitudes, written comments and unwanted physical contact with a sexual connotation.

the core values of FXB. Any attempt or act of abuse, exploitation or sexual harassment should be reported immediately to the reference persons or through the complaints mechanism.

d. Harm reduction mechanisms

- The employment contracts and cooperation agreements between FXB and strategic partners refer to this PPAP document, which stipulates the prohibition of any act of sexual abuse, exploitation or harassment.
- FXB systematically checks applicants' references and asks candidates to indicate whether they have been investigated.
- All those involved in FXB's activities are aware of the issues related to PSEAH and are aware of the sanctions that may be incurred.
- Individual interviews are held with all employees at headquarters (at least once a year) and in our countries of operation (at least once every two years), during which the PSEAH is discussed in complete confidentiality.
- Women and men are treated equally⁸. No discrimination on the basis of gender is tolerated in our actions, both in the functioning of the team at headquarters and in that of our strategic partners in our countries of intervention.
- Sexual relations and other acts of a sexual nature with our beneficiaries over the age of 18 are strongly discouraged and strictly forbidden with minors. Every employee at our headquarters and in our countries of operation must report if such a situation occurs to his or her superior as soon as possible.
- During monitoring trips to our countries of intervention, Program Managers are alert to all inappropriate or strange behavior. In case of doubt, investigations are launched.

3.2) Child protection (CP) and advocacy for vulnerable people

a. Definition

Children⁹ and vulnerable persons¹⁰ are at **greater risk of harm, abuse and/or neglect** because of their frailty and vulnerability. These risks include all forms of physical and/or emotional abuse, sexual abuse, neglect or negligent treatment, commercial or other exploitation, resulting in actual or potential harm to their health, survival, development or dignity.

FXB projects and programs are designed, and interventions agreed, on the basis of **the best interest of the child**. The child's best interest in terms of their rights and overall wellbeing is given the ultimate priority in organization's functioning, crisis management and program implementation. A child centered development approach is the guiding force to ensure the rights and the best interest of the child within the organization's operational framework.

Child Protection refers to protection from violence, exploitation, abuse and neglect. It is integrally linked to every other right of the child. Every child has a right to protection.

Child Safeguarding refers to institutional/internal policies and procedures intended to ensure that children are not exposed to harm and abuse through their contact with the organization, their staff and their participation in project and programs and that the organization's operations do not harm to the children in any way.

⁸ Gender equality.

⁹ Anyone under 18 years of age.

¹⁰ Vulnerability can be social, economic, psychological and/or physical.

Physical abuse is an act or acts which may result in injury to, or death of, a child.

Emotional abuse is any act or failure to act by the parent, guardian or caregiver which results in impaired psychological and/or emotional functioning and development in a child which may be expressed as anxiety, withdrawal, aggression, depression or delayed development. Emotional abuse is often hard to detect.

Verbal abuse is any act or acts which result in the exploitation of a child, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by adults or other young persons who are intellectually, emotionally, physically or sexually more mature than the child victim. Types of sexual abuse include, but are not limited to incest, rape, exhibition, sodomy, child prostitution, pedophilia, pornography, voyeurism, and cybersex.

Verbal abuse includes communication by words (i.e. Derogatory name calling by adults or other children, negative criticism, yelling as a form of discipline), vocal tones, racial taunts and accompanying body language and attitudes, which demean a person's worth.

Neglect is what you do or fail to do as a parent, guardian or caregiver that can hurt or cause injury to a child or even cause a child to leave home.

Technologically safe (**e-safety**) refers to protecting children from all harm that may be caused by technology including telephone, mobile phone, computer, tablets, laptop, and internet or any other information and communication devices.

b. People involved

- FXB International employees
- Members of the Committee
- Staff of the strategic partners
- Persons and/or organizations commissioned to carry out a project
- Sub-grantees
- Partners
- Beneficiaries
- Volunteers

c. Behaviors to adopt

FXB's responsibility as an organization is to ensure that it does not place children and vulnerable people at risk of harm and/or abuse through its activities, and that any concerns regarding the protection of children and vulnerable people in the communities in which it operates are reported to the relevant authorities¹¹. The use of physical violence as punishment or retaliation, the use of language intended to denigrate, humiliate or degrade, and the abuse of a child (including sexual relations with anyone under the age of sexual majority or 18, depending on the limit established by applicable law) or vulnerable person is not tolerated by FXB. Any harmful and inappropriate behavior towards children (including e-safety concern) or vulnerable persons must be reported immediately to the referees or through the complaints management mechanism.

All people involved listed above who may be in contact with children must never:

- Hit or otherwise physically assault or physically abuse children;
- Develop physical / sexual relationships with children;
- Develop relationships with children which could in any way be deemed exploitative or abusive;

¹¹ For children: Keeping Children Safe Coalition - www.keepingchildrensafe.org.uk

- Act in ways that may be abusive or may place a child at risk of abuse;
- Use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- Behave physically in a manner which is inappropriate or sexually provocative;
- Condone or participate in behaviour by children which is illegal, unsafe or abusive;
- Act in ways intended to shame, humiliate, belittle or degrade children or otherwise perpetrate any form of emotional abuse;
- Discriminate against, show preferential treatment or favour particular children to the exclusion of other children.
- This is not an exhaustive or exclusive list. The principle is that staff and volunteers should avoid actions or behaviour which may constitute poor practice or potentially abusive behaviour.

d. Harm reduction mechanisms

- FXB undertakes a detailed analysis of job descriptions assessing the level of contact with children, therefore the level of risks.
- FXB systematically checks identification documents, references and asks all applicants to formally indicate whether they have been investigated.
- The employment contracts, the cooperation contracts between FXB and the strategic partners refer to the PPAP.
- All those involved in FXB's activities are aware of the issues related to child protection and the defense of vulnerable people. They are also aware of the sanctions that may be incurred.
- The strategic partners inform the beneficiary population about the conditions for the program or project implementation, including the formal prohibition of child labor, as well as about the transactions (cash, in-kind, service, etc.) that will result from it. FXB ensures that beneficiary population understands that no favor can be asked in return for anything that is provided, and that no one has the power to influence positively or negatively the support received.
- During the implementation of the projects, awareness is raised among the beneficiary groups/population about the issues of child and vulnerable persons protection and the interest in setting up complaints mechanisms.
- Child protection and vulnerable persons issues are embedded in FXB's audits of strategic partners and local partners working with children.
- For all people, it is advisable to be visible when working with children or vulnerable people and never to be alone with them.
- In general, it is inappropriate to spend excessive time alone with children away from others unless staff are conducting one-on-one counselling sessions, and to take children to staff or volunteer place of lodging or go theirs, outside the clearly defined activities of the program.
- Inadequate behaviors related to child protection and vulnerable persons' advocacy observed in supported facilities are reported to the relevant authorities, in order to clarify the situation. External monitoring is conducted by our strategic partner to ensure effective change.

- Informed consent (written or verbal) has to be obtained from caregivers and the child before any photographs are taken, and how images will be used is clearly explained. Images taken preserve the child's dignity and respect their privacy.
- Where photographs of children are used, it does not include identifiable information such as their full name or address.
- When running events where photography might take place, steps are taken to clarify and promote the photography rules for the event to all staff, volunteers, spectators, parents and child participants.
- During monitoring trips to our intervention countries, the Program Managers are alert to any inappropriate or strange behavior. In case of doubt, investigations are carried out.

3.3) Fighting corruption

a. Definition

Bribery consists of the briber **giving some kind of advantage** to a person (the bribe taker) to **perform or not to perform an act that is within the scope of his or her function and/or prerogatives**. Both persons are acting with knowledge of the facts. For there to be corruption, there must be a causal link between the action of the bribe taker and the consideration for that action. This consideration can take different forms: a gift, a donation, the granting of a project, a position within a group, etc.

Active bribery occurs when the person who bribes initiates the bribery and **passive bribery occurs** when the act of bribery is initiated by the person who is bribed, i.e. the person who performs or does not perform an act in exchange for a consideration.

b. People involved

- FXB International employees
- Committee members
- Staff of the strategic partners
- Persons and/or organizations commissioned to carry out a project
- Sub-grantees
- Local partners
- Beneficiaries

c. Behaviors to adopt

FXB demands impeccable behavior from all those involved in its actions. Corruption leads to inefficient use of resources and hinders sustainable economic development. Any attempt or act of corruption should be reported immediately to the relevant persons or through the complaints mechanism.

d. Harm reduction mechanisms

The following measures are in place to reduce the risk of corruption. They must be applied:

- The employment contracts of FXB employees, the cooperation contracts between FXB and strategic partners, and the employment contracts of employees of strategic

partners in our countries of operation refer to this Protection Policy against Abuse of Power Policy (PPAP) document, which stipulates the prohibition of corruption and the obligation to report such conduct.

- An intervention strategy is developed according to the institutional strategy. The choice must be made on the basis of reliable and objective data collected in the field. No quid pro quo is tolerated.
- The selection criteria for programs and projects must comply with *the "Project Cycle Management Manual"*. No quid pro quo is allowed to influence the choice of project.
- The *"Specific Agreements"* of the programs include the funding modalities and the maximum amount allocated to each project and refer to a detailed budget in the project file. All expenditure must be supported by accounting documents.
- The strategic partners inform the beneficiary population about the conditions for the implementation of the program or project as well as about the transactions (cash, in-kind, service, etc.) that will result from it. Transparency is the watchword.
- The money is channeled through our strategic partner to pay the bills directly for the implementation of the programs or projects. Intermediaries are kept to a minimum.
- The principle of double-checking is systematically applied to the payment of invoices both in Switzerland and in our countries of operation.
- Goods in kind or in cash handed over by the project beneficiaries, the partner organization or the political authorities should not be accepted if their value exceeds the symbolic character. To avoid misunderstandings, any refusal must always be argued sensitively, taking into account customs.
- FXB International's accounting is audited by a ZEW-accruited trustee, and the accounting of our strategic partners is also externally audited annually.
- All actors involved in FXB's activities are aware of the issues related to corruption and the penalties incurred.
- Any changes during the implementation of the project compared to the initial application must be reported to the Program Manager in Switzerland for approval. Once the project has been implemented, the Program Manager will carry out a verification. In the event of inconsistencies between the project file, the report and the actual implementation, an investigation is launched to clarify the situation.

3.4) Intransigence in the face of misappropriation of funds/property

a. Definition

Embezzlement¹² is the **fraudulent appropriation by a person or organization**, to the detriment of another (individual or organization), for his or her own benefit, **of funds or/and property, which have been entrusted to him or her, and which he or she has accepted for a specific purpose.**

¹² In legal terms, this is a breach of trust.

It is therefore not an advantage granted by a third party, but a favor that a person or organization derives directly from its position¹³.

b. People involved

- FXB staff members
- Staff of the strategic partners
- Persons and/or organizations commissioned to carry out a project
- Sub-grantees
- Partners
- Beneficiaries

c. Behaviors to adopt

Misappropriation of funds can have direct effects on the implementation of projects and the efficiency of FXB's actions. Anyone must immediately report any attempt or act of misappropriation of funds/assets to the reference persons or through the complaints mechanism.

d. Harm reduction mechanisms

- The employment contracts of FXB employees, the cooperation contracts between FXB and strategic partners, and the employment contracts of employees of strategic partners in our countries of operation refer to this PPAP document, which stipulates the prohibition of embezzlement and the obligation to report such actions.
- When recruiting employees, their integrity and skills are carefully assessed by two people.
- The strategic partners inform the beneficiary population about the conditions for the implementation of the program or project as well as about the transactions (cash, in-kind, service, etc.) that will result from it. Transparency is the watchword.
- The funds sent are intended for a specific use. They must be used exclusively for their original purpose and may not be used to cover other expenses without the prior approval of the Program Manager. The traceability of funds must be guaranteed.
- The money is channeled exclusively through our strategic partner to pay the bills for the implementation of the projects. Intermediaries are kept to a minimum.
- The management of building material stocks for the implementation of a program or project must be established in writing, at least by two people, one of whom must be from the strategic partner. In the event of a discrepancy between the actual and theoretical stock levels, superiors are immediately notified and an investigation is carried out.
- The principle of double-checking is systematically applied to the payment of invoices both in Switzerland and in our countries of operation
- FXB International's accounting is audited by a ZEW-accredited trustee, and the accounting of our strategic partners is also externally audited annually.

¹³ Specificity compared to corruption where there is a need for interaction between two entities (people or structures).

- Any changes in the project's implementation of the initial proposal must be reported to the Program Manager in Switzerland. The Program Manager must give his/her approval. Once the project has been implemented, the Program Manager will carry out a verification. In case of inconsistencies between the project file, the report and the actual implementation, an investigation is launched to clarify the situation.
- The Program Manager must approve the use of a property (offices, buses, cars, motorbikes, etc.) belonging to FXB or strategic partners for private purposes under clearly defined conditions and in full transparency.

3.5) **No favoritism** (non-discrimination)

a. **Definition**

Favoritism¹⁴ is the attitude of one person or structure **granting unjustified favors to another person or organization** without considering competence, ability, merit and fairness. Power is used for private purposes to **privilege relationships** against the principle of equal treatment and opportunity that FXB holds dear. This privilege can materialize in many forms; from the granting of a project, a job, to the assignment of volunteers to events.

b. **People involved**

- FXB staff members
- Committee members
- Staff of the strategic partners
- Persons and/or organizations commissioned to carry out a project
- Sub-grantees
- Local partners
- Beneficiaries
- Volunteers

c. **Behaviors to adopt**

Favoritism can have direct effects on FXB's actions both in Switzerland and in the countries of intervention. Instead of equal opportunities prevailing, there is a risk that arbitrariness will abound. FXB demands transparent and clear processes in all awarding procedures, no matter how diverse. Any act of favoritism must be discussed with the referee or communicated through the complaints mechanism. Favoritism must be combated, as it regularly leads to interpersonal tensions and resentment of unequal treatment. It is a poison that undermines the creation of a positive and constructive organizational culture, which is essential for the achievement of the set objectives.

d. **Harm reduction mechanisms**

- Work activities must be separated from private life. There are significant risks involved if they are intertwined.
- One can only activate the FXB network for business; and never for private purposes.

¹⁴ Nepotism is when family relationships are favored.

- The choice of intervention countries, the development of intervention strategies and the selection of programs or projects are based on existing processes by several people. Objective arguments must justify any choice.
- For the awarding of building contracts, main construction companies and/or artisans have to be chosen following a call for tenders. Technical competence, experience, quality of work, price and ethics are the main criteria to be considered. A company will only be selected if it meets all the requirements. The selection is made by at least two people.
- Any direct or indirect discrimination based on skin color, caste, national, ethnic or social origin, religion or belief, status, political opinion, gender, sexual orientation, disability or age is prohibited.
- The purchase of goods or services exceeding CHF 10,000 must be made on the basis of several offers, and at least two persons must decide.
- The recruitment of personnel (including trainees) in Switzerland and our countries of intervention is done according to their skills and verifiable abilities in order to meet the requirements of the previously defined specifications.
- Final recruitment is decided on the basis of an interview by at least two people.
- If a family member or personal acquaintance is to be hired, at least two FXB supervisors must be informed in advance and additional proof must be provided. A formal authorization must be issued by FXB.
- When FXB has tickets for festivals, concerts, cinemas, etc., a distribution policy is determined according to precise criteria. At least two people in the office, including the director determine these requirements determined.

3.6) Human-centered emergency response (Sphere)

a. Definition

FXB operates in the long term. **Therefore, FXB does not implement programs or projects in emergency contexts.** Nevertheless, it is possible that **disasters** (famines, cyclones, floods, earthquakes, etc.) may **occur in our intervention regions**. These events may lead FXB to intervene to support communities according to their urgent needs (food, reconstruction, etc.).

During emergency humanitarian interventions, FXB refers to **the Sphere standards**¹⁵. These define the issues involved in such an intervention, the precautions to be considered, and the standards to be respected. The objective is to avoid any form of abuse in a situation of extreme vulnerability. All the clauses of this document remain valid.

b. People involved

- FXB International staff members
- Staff of the strategic partners
- Persons and/or organizations commissioned to carry out a project
- Sub-grantees
- Partners

¹⁵ <https://www.spherestandards.org/>

- Beneficiaries

c. Behaviors to adopt

All FXB-related actors (strategic partners or agents) operating in a humanitarian intervention take the necessary measures to avoid or minimize any adverse effects of their intervention, in particular the risk of exposing people to increased danger or violation of their rights¹⁶. Persons in need shall have access to humanitarian assistance according to their needs and without discrimination. They are protected from violence, pressure or coercion that could be used to force them to act against their will. The population's helplessness due to the emergency situation must not be exploited in any way. Respect and dignity are the watchwords. Any inappropriate behavior in these particular situations should be reported to the reference persons or through the complaints mechanism.

d. Harm reduction mechanisms

- FXB supports emergency projects only in its countries and regions of intervention and always follows the Project Cycle Management Manual. Precise knowledge of the context and the actors involved saves precious time in organizing an appropriate intervention.
- The capacity and strategies that a population develops to survive in dignity are an integral part of the design and methods of humanitarian intervention. Their views are systematically taken into account.
- The priority needs of the disaster-affected population are identified through a systematic assessment of the context, the risks to a dignified life and the capacity of the affected people and the relevant authorities to respond.
- The humanitarian response is planned and implemented in coordination with the relevant authorities, other humanitarian agencies present and civil society organizations engaged in impartial humanitarian action, all working together to achieve maximum effectiveness, efficiency and coverage.
- Despite the urgency of the intervention, our strategic partners are required to submit a project file, according to the Project Cycle Management Manual. A report is also expected to assess the relevance and efficiency of the intervention.
- The performance of FXB's intervention is continuously reviewed and regularly communicated to stakeholders. Projects are adapted according to performance. Coordination between stakeholders is established.
- FXB provides appropriate management, supervisory and psychosocial support, enabling its strategic partners to have the knowledge, skills, behavior and attitudes necessary to plan and implement an effective humanitarian response with humanity and respect.

3.7) Ensuring quality work

a. Definition

Everyone who contributes to FXB's activities must be able to **carry out their work under quality and safety conditions** that guarantee their development. FXB wishes to be an

¹⁶ According to the "Do no harm" concept.

exemplary employer. Trust is the fundamental value governing the relationship between the employer, employees and agents, both at headquarters and in our countries of operation. In return, we expect high-quality work and the assumption of responsibility following the terms of reference. Arbitrary power relationships are banned. An open, caring, tolerant and transparent corporate culture is actively promoted.

b. People involved

- FXB International employees
- Staff of the strategic partners
- Persons and/or organizations commissioned to carry out a project
- Sub-grantees

c. Behaviors to adopt

We attach the greatest importance to our employees and agents, who are the strength of our organization, both at headquarters and in the countries where we work. We take our responsibility for their selection, support, supervision, training and working conditions very seriously. Discussions are planned so that employees and agents can express their feelings and concerns. FXB is listening and will do what it can to find appropriate solutions. Any malfunctions should be reported to the reference persons or through the complaints mechanism so that the situation can be quickly adjusted.

d. Harm reduction mechanisms

- All employees at the head office, our strategic partners and agents have an employment contract with detailed specifications.
- Criticism is only given on professional matters and never on personal matters. It is constructive and tactful. Relationships are respectful and aimed at creating a team spirit, which is essential for the successful achievement of objectives.
- Individualized interviews are carried out with staff both at headquarters by the Director (at least once a year) and in our countries of intervention by the Program Managers (at least once every two years). The interview allows us to measure the degree of satisfaction, among other things.
- Remuneration must allow employees to live in dignity in their country. They are determined according to qualifications, responsibilities, similar positions in self-help organizations and seniority. Benefits (flexible working hours, the possibility of working from home, free lunches, etc.) should also be taken into account when setting wages.
- The safety of employees and agents is guaranteed at all times.
- A service contract is signed with the company or craftsmen to define the conditions under which the program or project is to be carried out. Child labor is prohibited, as are exploitative practices.
- The transparency and traceability of the material supply chains are guaranteed both in Switzerland and in our countries of operation. Suppliers are evaluated according to economic, social and environmental conditions.
- Subcontracting is not tolerated. Any person performing work on behalf of or for FXB must be known.

4) Complaint mechanisms

In order for the Abuse of Power Protection Policy (APPP) to be effective, it is necessary to have a functioning complaints mechanism in place. Confidentiality will be strictly respected throughout the process for all stakeholders. Training will be provided to FXB employees at headquarters, and strategic partners. The aim is to enable them to take ownership of the matter and subsequently act in an irreproachable manner. Awareness-raising sessions will also be held with local partners/beneficiaries.

Complaints are managed at two levels depending on their origin. We take into account the challenges of the local languages spoken in our countries of intervention and the illiteracy of certain actors. The levels are as follows:

- All suspicions and reports from the Committee, FXB employees at headquarters, strategic partner employees and volunteers must be sent in the standard format by e-mail to sos@fxb.org or by post to FXB International at Rue de Lausanne 44, 1201 Geneva. They are received directly by the PPAP manager. The Committee appoints the PPAP manager from within or outside the company. Therefore, he is not involved in operational activities.
- Suspicions and reports from program or project implementers, beneficiary structures, beneficiaries or other actors in the countries of intervention will be channeled through the focal person or persons, of which at least one is a woman¹⁷¹⁸. The focal person or persons in the country of intervention must inform both the PPAP manager and the Program Manager in Switzerland as soon as possible, unless the latter is involved. The standardized complaint form will be used systematically to provide a written record. All recorded suspicions and reports must be communicated to the PPAP officer and the Program Manager in Switzerland.
- Strategic partners establish an effective and operational mechanism to receive complaints from the field in confidence. They submit the local procedure to the Program Manager in Switzerland for validation¹⁹. This is assessed during field visits. Before the start of programs or projects, all stakeholders must be informed of the existence of such a mechanism and precise explanations are given as to its use and purpose.
- During the implementation of programs or projects, the strategic partner also promotes the establishment of internal and independent power abuse warning systems among local partners. The aim is to disseminate this good governance practice and to ensure that it can function independently in the long term after the project has ended.

All suspicions and reports will be dealt with as quickly as possible at all levels. As soon as a complaint is registered, an exchange will take place with the victim to define the safeguards that need to be put in place to ensure their safety. The victim will also be kept informed of the progress of the investigation, without the content being disclosed. The aim is that a complaint can be dealt with within a maximum of 6 months after registration.

¹⁷ Need to write (illiteracy issue) and/or translate the complaint.

¹⁸ This may be the director of the strategic partner or a staff member. It is important that he/she is not directly involved in the implementation of the project (to reduce the risk of conflict of interest).

¹⁹ The provision of a direct and confidential telephone line to the PPAP officer is the preferred solution.

The investigation committee will be made up a priori of the PPAP manager, the director, the Program Manager and the director of the country office. If any of these people are involved, she or he will be excluded from the investigation committee. If necessary, an external auditor can take over. The persons conducting the investigation must have no connection with the case (avoid any conflict of interest).

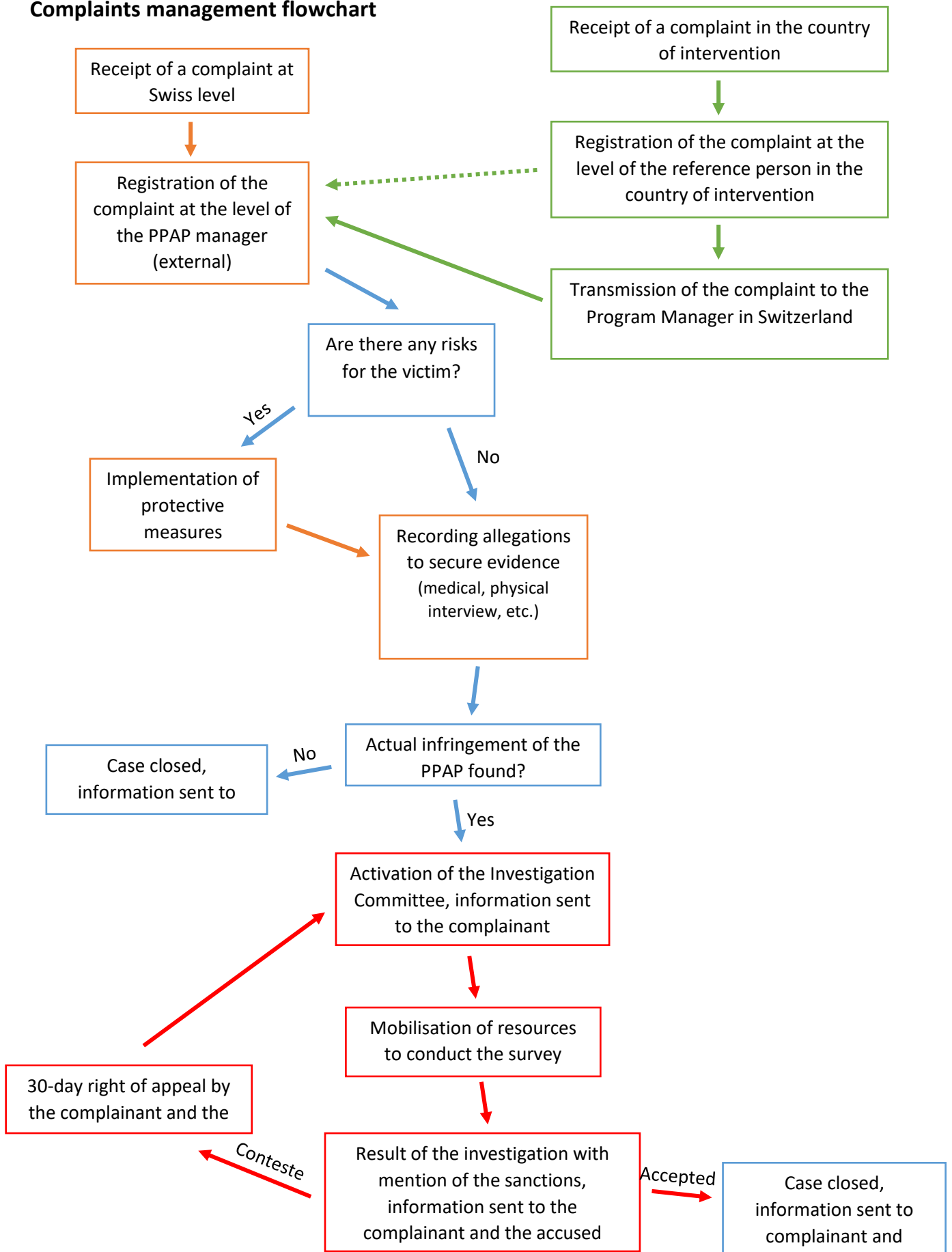
The Investigation Committee will take whatever action is deemed necessary:

- Establish the facts as objectively as possible (the presumption of innocence prevails) while protecting the reputation and anonymity of the person(s) involved.
- If the transgression is proven, report the case to the competent authorities following the legal framework and subject to duly documented exceptional circumstances.
- To impose the corresponding disciplinary sanctions, including suspension or immediate termination (for serious reasons) of the employment contract.
- Reserve the right to inform other organizations that may request professional references regarding the termination of the contract following a serious breach of the PPAP, within the limits of applicable laws relating to the protection of individuals and their data.
- Define appropriate measures to prevent the recurrence of such incidents by updating the relevant processes.

The aim is not to create a culture of whistleblowing or permanent suspicion, but to have a clear framework that sets limits that must not be exceeded. Any person who makes abusive denunciations aimed at harming FXB or a member of staff or an agent will be subject to disciplinary measures and, depending on the seriousness of the matter, may be reported to the competent authority.

5) Complaints management

Complaints management flowchart



6) Penalties incurred

We have zero tolerance for any form of abuse of power - whether towards our beneficiaries, our headquarters staff and strategic partners, members of the communities we serve, or any other person in a vulnerable situation - committed by any member of staff or any agent acting on our behalf.

FXB will take disciplinary action in cases of proven abuse of authority. FXB will systematically investigate to clarify the allegations. The PPAP manager, the director, the Program Manager and the director of the country office of intervention are responsible for this, or if one of these persons is involved, the FXB management committee or an external auditor. The persons conducting the investigation must have no connection with the case to avoid all conflicts of interest. During this period, the offending party will be temporarily removed from his position, and any work in progress will be suspended if necessary. Once the situation has been clarified through an investigation (internal or external, depending on the seriousness of the actions), FXB will determine the sanction according to the seriousness of the facts: further training (in case of minor case), warning, dismissal, breach of contract and complaint (reporting to the police or legal actions). In all cases, FXB will endeavor to understand the reasons for improper behavior to improve the anti-abuse of the power system.

7) Data Safety

FXB ensures that records and data collected through any of the complaint mechanisms' channels are only useful for the potential investigation of the abuse of power case. People sharing data to complete the records must clearly understand this.

The issue of confidentiality is of the utmost importance when dealing with issues and concerns regarding possible abuse. FXB staff members/volunteers must exercise extreme vigilance in protecting information and must pass on this information via the reporting process as described. When working with children, the issue of confidentiality becomes very difficult at times. When a victim (including children) discloses abuse, the person who responds to that cannot promise to keep secrets. For this reason, it is essential to make clear the fact that it may not be possible to keep such information wholly confidential. Ideally, this should be done before any such matter arises. A written document or statement could be used to get the victim's permission to share the information with selected other people. The process must be discussed with the victim to ensure that he/she knows at all times what to expect.

Any concerns, allegations or disclosure must be written down at the time or as soon as possible after the concern has been raised. Records must always be signed and dated.

Detailed records are very important especially where the victim is disclosing abuse or making an allegation. Every detail of the alleged abuse should be recorded and all subsequent actions be documented.

Paper-based records must be kept in a safe place where it is not accessible to everyone. If possible, the records must be locked away. Digital records are stored on FXB's server and accessible only by the PPAP Manager and the investigation committee. Information may only be shared with relevant parties and it must always be done in such a way that the confidentiality is maintained.

More generally, data about beneficiaries (children, women, men, groups, cooperatives, etc.) are sensitive information. When conducting data collection, FXB always starts by explaining to the respondent why the data is being collected. The management, custody, and destruction of records and beneficiary data must follow the same procedure as any confidential document of the organization as per the Administration and Financial Manual.

Finally, staff and volunteers' personal information as well as beneficiaries' names and details are not published online. When testimonies are shared through communication channels, names and details of the beneficiaries are changed.

8) Conclusion

FXB works with the most vulnerable populations daily. FXB's projects and programs aim to prevent and reduce all forms of violence and insecurity by promoting a safe, secure and protective environment for all our staff at headquarters, our strategic partners' staff and our beneficiaries. Therefore, it is of the utmost importance that the organization has a clear policy in place on protection against abuse of power and mistreatment.

This document is therefore intended to protect them. It is essential, to fulfil our mission, that the activities carried out by FXB do not in any way involve abuse of power or mistreatment. By establishing this Protection Policy against Abuse of Power (PAAP), we wish to break the taboo and facilitate the freeing of speech. The protection mechanisms must be known and accessible to all so that victims feel protected and safe.

Document accepted by the Committee by circulation on 24.03.2023

The PPAP replaces previous FXB policies on child protection and sexual exploitation and abuse of 2019 and updated in 2021

FXB's PPAP is inspired by the one of Nouvelle Planète