



Italian Association  
Friends of Raoul Follereau



# MANUAL OF OPERATIONAL POLICIES

CODE OF ETHICS AND CONDUCT  
2020

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## Why a Policy Manual?

- With the widening of AIFO's project activities, and therefore of the circle of co-funders and stakeholders, it is more and more necessary to bring together in **a single document** the general guidelines, principles, behavioral and operational lines.
- Internal procedures for the purchase of goods and services (2017).
- AIFO policies and guidelines on safety and protection of personnel operating in countries at risk (2016).
- Staff Regulations (2013).

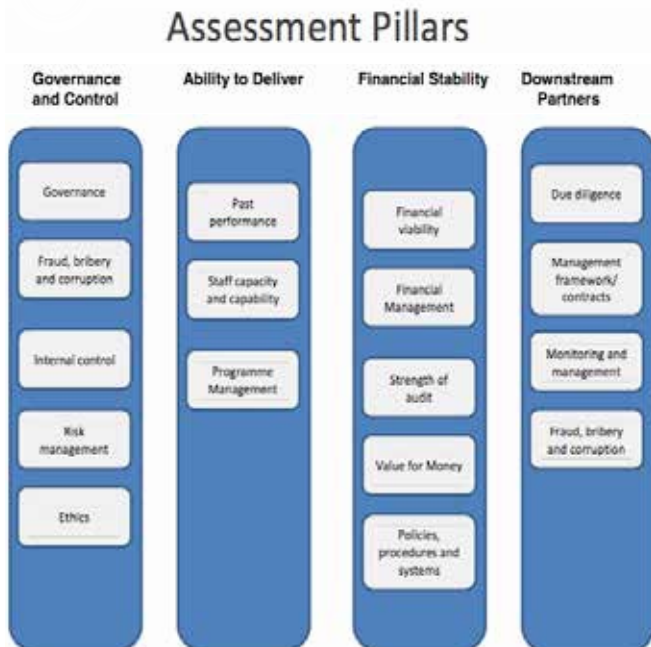
## Policy documents of the Association

- Regulations for the management of activities in countries, specific to individual geographical areas (2017).
- Regulation on Conflict of Interest and the Internal Control Committee (2017).
- Guidelines for the Promotion and Management of initiatives abroad (2009).
- Organisation, Administration and Accounting Regulations (2009).
- Regulations for the functioning of the organs of the association and its local structures (2014).
- etc...



## Compliance with obligations (Due diligence)

- Meet the requirements of **due diligence** required by institutional donors.



## Valutazione di *due diligence*

- **Governance**
    - the **legal basis** for the organisation.
  - **Anti-corruption**
    - Official **fraud** and corruption policies.
  - **Internal Control**
    - The **compliance** with policies.
  - **Risk management**
    - The **risk** management policy.
  - **Ethics**
    - **Ethical Code** of Conduct.
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MODULE 1

## STRUCTURES AND PROCESSES

- ▶ Association policy
- ▶ Human resources policy
- ▶ Denunciations and complaints policy
- ▶ Health and safety policy

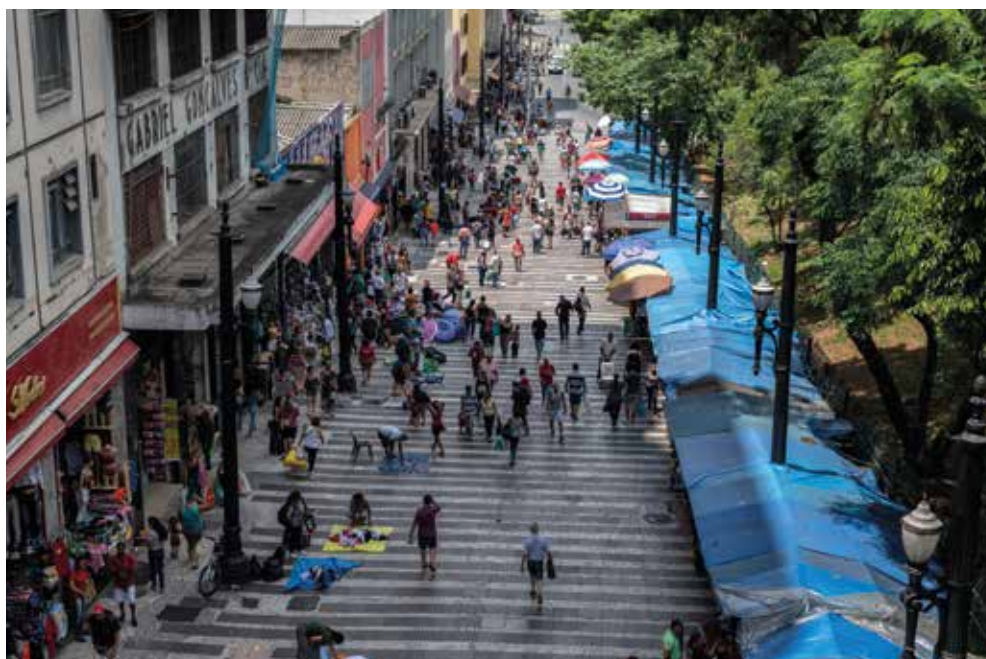
## ► ASSOCIATION POLICY

### About us

- AIFO is an Italian non-profit association recognized as an NGO, at national and international level.
- It operates in the field of International Development Cooperation, carrying out social-health initiatives for the rights of the last and inclusive development.

### Our roots and values

- Founded in 1961, in Bologna, by a group of Combonian volunteers and missionaries inspired by Raoul Follereau's messages of love and justice, "Against Leprosy and All Leprosies".
- Every person, especially if marginalised, must be restored to dignity and social relations must be based on equity.
- The person, to whom AIFO addresses, is the protagonist of the decisions concerning him/her.





# Mission e Vision

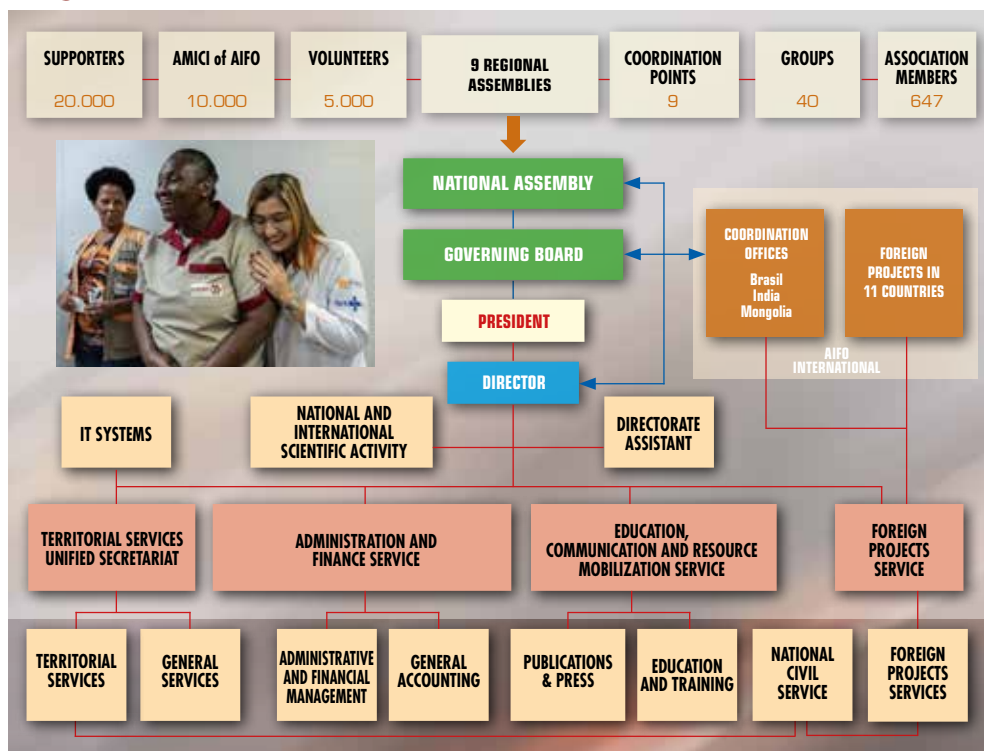


## Objectives and activities

- The promotion of cooperation policies focused on the development of people and the defence of the rights of the most vulnerable ;
- Material, medical and moral support for people suffering from Hansen's disease;
- Social and health programmes focused on people with disabilities, children and the most vulnerable;
- Accompanying communities to overcome the various causes of marginalisation, discrimination and poverty.



## Organizational structure





## Foreign projects 2019

PROGETTI AIFO ALL'ESTERO 2019	BY CONTINENT
AFRICA	20
ASIA	17
CENTER AND SOUTH AMERICA	12
MULTI-COUNTRY	3
<b>TOTAL</b>	<b>52*</b>

(\*) Progetti in 12 Paesi: 6 in Africa, 2 in Centro e Sud America, 4 in Asia.

PROGETTI AIFO ALL'ESTERO 2019	BY TYPOLOGY OF ACTION
LEPROSY/ PRIMARY HEALTH	23
REHABILITATION/CBID	23
COORDINATION/PROJECT MGT	6
<b>TOTAL</b>	<b>52</b>

PROGETTI AIFO ALL'ESTERO 2019	BY PARTNER
NGOs/LOCAL MOVEMENTS	14
GOVERNMENTS	14
RELIGIOUS ENTITIES	4
MULTI-PARTNERS	14
SUPPORT TEAMS	6
<b>TOTAL</b>	<b>52</b>



## The Partnership



## ► HUMAN RESOURCES POLICY

### The fundamental principles

- **Inclusion:** We involve, support and recognise the diversity of all members of global citizenship;
- **Integrity:** We respect ethical codes of conduct that comply with international standards;
- **Collaboration:** our success is based on the creation and promotion of relationships with other organisations and associations aligned to the same values;
- **Effectiveness:** We value efficiency and excellence in our work, and we focus on results;
- **Innovation:** we are dedicated to research to find, develop and cultivate innovations that improve the effectiveness of our work.

### Recruitment, selection and appointment

- Personnel must be selected by means of tests and documented with a special report that also highlights any necessary training activities and is regularly stored and archived.
- The hiring of AIFO's employees or collaborators - whenever it occurs - depends solely on the decision of the Employer and the Personnel Manager, who shall also have to take part in the selection, on the basis of the Italian labour law and the specific resolutions of the Board of Directors.



## Disciplinary and complaint procedures

- Employees and staff members, within the framework of national labour contracts and approved internal procedures, may submit complaints or requests to higher levels of authority. Any sanctions imposed by the Employer shall refer to the same regulatory framework.
- The respective Service Managers and the Management will examine the matter and take a decision on it, always in compliance with the contractual regulations and procedures approved by the Board of Directors..

## Induction of new employees

- AIFO makes sure that all new employees feel welcome and are ready to start work in a safe and competent way.
- Reception - New employee is received, introduced to colleagues, and provided with documentation as in the following points:
  - Contract, Internal and management regulations, Disciplinary procedures, complaints procedures, Terms of service,
  - Organization's policies, Code of Ethics of Conduct with special attention to sexual exploitation and abuse and child protection policy,



## Leaving the association

- **Return of work objects and tools:** Employees are required to return all documents, books, office keys, laptop or any other resource belonging to AIFO, including all paper and electronic copies, to facilitate the handover and are bound to confidentiality.
- **Exit interview:** employees shall share with their Service Manager, or Senior Manager, the handover and an evaluation of their experience at AIFO. The interview must be conducted in complete confidentiality.
- **Termination of service:** An employee's service may be terminated on the basis of the national employment contract for the category, Italian law or individual contract.



# ► COMPLAINTS AND SANCTIONS POLICY

## The Internal Control Committee

- The Board of Directors of AIFO in 2017 approved the establishment of an Internal Control Committee, which is entrusted with the effective application of the regulations and procedures.
- The role and responsibilities of the Internal Control Committee are defined on the basis of the control standards adopted by other international NGOs, it will strictly comply with national and international regulations, with AIFO's contractual commitments towards lenders, and will be headed by the Director, who will report regularly to the Board of Directors,
- **Employee:** a person employed in the workplace for any regular, temporary ad hoc or daily wage job.
- **Place of work:** any place where the injured party is present in relation to his/her work with AIFO.
- **Employer:** it is the person who has the sole responsibility of the organisation itself as it exercises decision-making and spending powers.

## History of the complaint

- The complaint must be made on the basis of the provisions of the national contracts and in any case within 3 months of the fact that you intend to complain.
- If a formal investigation is initiated, the complainant responds with his or her justifications within 10 days of receipt of the complaint.
- The final report of the Internal Control Committee is compiled and submitted to the Director of AIFO within 90 days from the start of the formal investigation. Meetings and virtual interviews are allowed.

## Definitions

- **Complainant:** A person who claims to be injured by unethical behaviour in the workplace or to have been subjected to any act of sexual misconduct or genderbased abuse.
  - **Complained against:** a person against whom a complaint of unethical behaviour in the workplace or sexual misconduct or abuse related to gender has been lodged.
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## Guidelines for a complaint

- Without prejudice to the responsibilities of the Employer, the Personnel Manager, the functions of the Board of Arbitrators and the statutory powers, the Internal Control Committee is responsible for handling complaints and grievances;
- The Internal Control Committee must ensure that the description of the case is direct, simple and confirmed by the complainant.
- The complainant's willingness to proceed to informal resolution or formal investigation is determined.
- The complainant is informed that, although the trial is confidential, the complainant must be informed as well as any witnesses and persons directly involved in the investigation procedure.

## Informal resolution

- If the complainant opts for an informal resolution, the Committee will use the following procedure:
- Inform the complainant against and give him/her the opportunity to respond.
- Make sure that both parties understand their rights and responsibilities according to the policy of the association.
- If possible, mediate a satisfactory outcome for the complainant.
- Once the agreement is implemented, there will be no further investigation of the same complaint.

- Monitor to ensure that the reported incident does not recur.

## Formal investigation

- If the complainant requests a formal investigation, the Internal Control Committee will make every effort to
- Offer justice to all concerned.
- Interview all interested parties directly, separately.
- Interview the witnesses, separately.
- Determine whether there is sufficient evidence to conclude that the reported facts and, in particular, sexual misconduct, have occurred.
- Exploitation and abuse.

## Provisional action

- During the formal investigation process, AIFO Management will determine the appropriate actions, which may include a change of tasks and the transition to other working arrangements.
- When the provisional action is implemented, AIFO Management shall inform the Committee of the measures taken.

## Closure of the investigation

- The Internal Control Committee may close the investigation if both the complainant and the complained against are absent for three consecutive hearings without giving any written reasons.
-



- If the Committee concludes that the complaint is fictitious, it may require the employer to take appropriate action against the complainant.
- The investigation ends with the final decision of the Committee and the employer is invited to act accordingly, without prejudice to the relevant rights of all parties involved.



## ► POLICY HEALTH AND SAFETY

### Policy

- AIFO will provide, as far as possible, a safe working environment for the health, safety and well-being of our employees, collaborators, volunteers, suppliers and visitors who may be involved in our work.
- To do so, the organisation will have to:
  - provide information and training;
  - Assess the risks before you start working in new areas of work;
  - Eliminate unacceptable safety risks;

### Responsibility

- AIFO has appointed specific professionals:
  - an occupational physician for health surveillance,
  - a technician with requirements appropriate to the nature of the risks present in the workplace.
- All persons responsible for the work activities of other employees must:
  - identify practices and conditions that may harm workers, beneficiaries, the public or the environment.
  - control and report such situations or eliminate the security risk.
- AIFO requires a proactive attitude. Everyone has the responsibility to ensure health and safety at work.

### Control methods

- Current performance standards for health and safety in the workplace will be regularly monitored:
  - health and safety information and training, risk assessments.
  - assessment of security conditions during missions abroad, according to the instructions of the Ministry of Foreign Affairs (MAECI) and the Agency for Development Cooperation (AICS).
- Annual Report to the Board of Directors.

### Implementation of this policy

- AIFO for its international cooperation activities adopts the following document to integrate its security guidelines :
  - "SUGGESTIONS FOR RISK MANAGEMENT AND SAFETY OF OPERATORS OF INTERNATIONAL COOPERATION AND SOLIDARITY ORGANISATIONS - DOSSIER PREPARED BY NGOs AOI, CINI, LINK 2007 IN COLLABORATION WITH THE MAECI CRISIS UNIT".



## MODULE 2

# POLICIES ANTI-DISCRIMINATION

- ▶ Gender policy
- ▶ Sexual exploitation policy
- ▶ Child protection policy
- ▶ Harassment exploitation and abuse policy
- ▶ Rules for humanitarian aid workers on sexual conduct (PSEA-IASC document).

## ► GENDER POLICY

### The policy

- AIFO believes in justice and equality. Women and men are treated equally in all aspects, with respect and dignity.
- No member or associate of the organisation discriminates on the basis of gender.
- In the event of discrimination based on gender, the Internal Control Committee carries out a vigorous and timely investigation, shared with the parties concerned

### Scope of gender policy

- Recruitment, contracts; performance evaluation; remuneration processes.
- All services of the association and

the programmes supported must be implemented taking into account gender policy.

### Responsibility for implementing gender policy

- Each AIFO service is responsible for monitoring and implementing this policy.
- This will require a specific commitment on the part of those responsible for the Service, depending on the purpose of the activities carried out (e.g. human resources, communication, programme).
- The implementation of the policy requires the participation of all units and offices.

## ► SEXUAL HARASSEMENT AND ABUSE POLICY

### Purpose

- Promote, protect and ensure the full and equal enjoyment of all human rights, especially the most vulnerable people, and promote respect for their inherent dignity.
  - All staff, trainees, volunteers, consultants work together with respect for the dignity of all people.
  - Every person, whether injured or witnessing exploitation, sexual abuse or sexual exploitation, must be treated with dignity and care primarily for his or her well-being and safety.
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## Definition of the workplace

- **Place of work:** any place where the injured party is present in relation to his/her work with AIFO.
- This policy covers all AIFO workplaces, including residential camps, offices abroad and project offices connected to AIFO.

## Obligations of the employer

- Provide a working environment that includes safety and security in the gender relations of the people who work there.
- Raise awareness among employees, collaborators, partners on policies regarding the prevention of exploitation, abuse and sexual exploitation.
- Provide the necessary facilities for complaint handling and investigation activities.
- Provide assistance to people who decide to report abuse or gender-based violence.
- Treat sexual exploitation as a serious violation of the Code of Conduct and take appropriate disciplinary action.

## Definitions

### Sexual exploitation

- Sexual exploitation includes any unwanted behaviour of a sexual nature that makes someone feel offended, humiliated or intimidated.
- It includes situations in which a person is subject to sexual attention as a condition of their profession, as well as situations that create a hostile, intimidating, blackmailing, discriminatory and humiliating environment for programme beneficiaries.

Any sexually determined behaviour, whether at work or in connection with professional activity, amounts to sexual misconduct:

- Implicit or explicit promise of preferential treatment .
- Implicit or explicit threat of discriminatory treatment.
- Implicit or explicit threat to the status of the current or future person
- Intimidating, offensive or hostile interference with a person's life and work
- Humiliating and sexually-motivated treatment that can affect a person's health or safety.

Sexual misconduct may involve one or more episodes, but is not limited to the following cases:

- Physical: unwanted physical contact, including caressing, pinching, kissing, hugging, inappropriate

touching, physical violence due to sexual assault.

- Minutes: observations on appearance, clothing, body, age, private life.
- Sexual: comments, stories and jokes, the use of threats or rewards to solicit sexual favours.
- Non-verbal: exposure of sexually explicit or suggestive material or gestures, persistent observation, whistling.
- Sexual approaches: repeated and unwanted social invitations and the sending of sexually explicit messages (by phone or internet).

## **Complaint and complaint procedure**

- If you can do so, inform the alleged harasser that his or her behaviour is offensive, undesirable, against the organisation's policy and should cease.
- The date, time and place of the misconduct episode(s) must be noted.
- If you are unable to discuss with the alleged harasser or if the unwanted conduct persists, report it to the service manager.
- If you consider that this is not appropriate to the situation, talk to other persons in positions of authority, the Director or a member of the Board of Directors.

- If motivated by the facts, a report will be made to the Association's control and sanctioning bodies.

## **Implementation of this policy**

- It applies to all employees, volunteers, suppliers, collaborators and occasional employees working for AIFO and it also applies to AIFO offices' visitors all over the world.
- is a public document available among the communication and information material, is shared with members, supporters, volunteers, consultants and trainees and is part of the agreements signed with partners.

## **Assistance and contact**

- For any professional assistance to injured persons and witnesses of misconduct, abuse and sexual exploitation, AIFO has established a list of contacts, at national level, which is continuously updated.
- In Italy  
<https://www.adocnazionale.it/centri-antiviolenza-lelenco-completo/>
- Foreign offices will refer in the matter to national networks or international cooperation bodies present in the territory.



## ► CHILD PROTECTION POLICY

### Definition of Minors

- Children are defined in the United Nations Convention on the Rights of the Child as all persons **under the age of 18**. “.
- AIFO **works** with thousands of children to transform their lives through targeted health care, community-based rehabilitation programs and educational initiatives.
- AIFO's policy on child protection is based on the United Nations **Convention on the Rights of the Child** (1989).
- **Report** any problems of child abuse or exploitation.
- **Ensure** an adequate response in the event that a child may be abused or exploited.
- **Cooperate** fully and confidentially with any investigation in case of doubts and allegations.
- Always **ask** the consent of the children (or, in the case of children, ask the consent of their parents or guardians) before taking photographs. Children's stories and images should take into account the best interests of the child.

### Scope of child protection policy

- **The aim of** this policy is to **prevent and report** child abuse on all sides. This policy applies to:
  - AIFO: Board of Directors, all staff, consultants, trainees and volunteers.
  - Partner organisations in the projects: all staff (parttime and full-time).
  - All suppliers and donors (institutional and individual).

### Behavioural protocol and code of conduct

- **Never abuse** and/or exploit a child and do not act / behave in any way that could endanger or harm a child.

### Assistance and contact:

- For any professional assistance to victims and witnesses of child abuse, AIFO indicates a list of contacts, at national level, which is continuously updated.
- In Italy  
<https://azzurro.it/contatti/>
- Local offices will refer these matters to equivalent bodies at national or international cooperation level.

## ► REPORTING AND WHISTLE BLOWING POLICY

### Reporting and alert policy

- Any person working with or for AIFO must be **alert** to signs of illegal or criminal activities by individuals or organizations working with or for AIFO and is encouraged to communicate such behaviour using this policy.
- Anyone who attempts to discourage, **intimidate** or penalise a person in an attempt to prevent the reporting of a suspicious case is subject to appropriate formal sanctions and may be reported to the appropriate internal and, if necessary, external authorities.

### What to report

It must be reported, in the public interest, that acts have been committed:

- Criminal offences (e.g. fraud, corruption, money laundering, modern slavery, support or involvement in terrorism).
- Failure to comply with legal obligations or regulatory requirements;
- Failure to comply with accounting and administrative control procedures
- Putting someone's health and safety at risk.
- Damage to the environment.
- Coverage of offences.
- Unethical conduct.

### Procedure

- Reports should be made as soon as possible. Reports can be raised verbally but preferably in writing, providing the background to the cases, including relevant dates and witnesses.
- First, you must raise the case with your immediate supervisor. However, if the line manager is involved in wrongdoing or is unable to raise the matter with this person specifically, the case must be reported to one of the following:
  - Directly to the Management and the Internal Control Committee.
  - By sending a written note for the attention of the Chairman.

### Confidentiality

- AIFO will treat these reports as confidential. The identity of the person submitting a notification must be protected. The report may be kept confidential.
- Following the investigation, the person who made the report will be informed of the outcome. However, the need for confidentiality may mean that it is not possible to provide many details. All information provided about the investigation must be considered strictly confidential.

## ► PREVENTION OF SEXUAL EXPLOITATION AND ABUSE (PSEA)

### What PSEA means

- 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, profit, social or political gain arising from the sexual exploitation of another person.
- Sexual abuse" is a **real or threatened physical intrusion** of a sexual nature, either by force or under unequal or coercive conditions.
- Bulletin of the UN Secretary General (ST / SGB / 2003/13)
- It is important to know the difference between sexual exploitation and sexual abuse (SEA) and sexual harassment.

- In both cases, sexual misbehaviour is committed by agency staff or partners.
- However:
  - SEA victims are beneficiaries or members of the community,
  - while victims of sexual harassment are employees of agencies or partners.

### Prevention of sexual exploitation and abuse (PSEA)

- **Prevention** = Awareness and training.
- **Report** = Communication, Alert, Complaint, Confidence.
- **Investigation** = Confidentiality, seriousness, facts, rights of both sides.
- **Support** = Pay attention to the interest of the victim.



## ▶ RULES OF CONDUCT ON SEXUAL EXPLOITATION AND SEXUAL ABUSE (PSEA)

### Rules of conduct

- **Humanitarian** workers may face disciplinary **sanctions** - including expulsion - **for unacceptable behaviour in** relation to sexual exploitation and sexual abuse.
- Humanitarian workers may not have sexual relations with persons **under the** age of **18**, even if this is legal in their country of origin. Claiming not to know the real age of the person is not a valid excuse.
- Humanitarian workers cannot **offer money**, employment, goods or services based on sex, including goods and services used to help people in need. Humanitarian workers must not promise or offer money, jobs, goods or services to make others accept **any kind of behaviour that humiliates or exploits them**. This includes, for example, paying or offering money to a prostitute in exchange for sex.
- Humanitarian workers have an influence on those who receive goods and services. This puts them in a position of power over people in need of help. Humanitarian organizations should strongly encourage their **staff not to have sex with beneficiaries of a humanitarian emergency**.
- If a humanitarian worker **suspects that** someone in his or her organization or other humanitarian organizations may be violating the rules on sexual conduct, he or she **must report it**, following the procedures adopted by his or her agency.
- Employers must create and maintain an environment that avoids unacceptable sexual behaviour and encourages employees to **behave in accordance with their codes of conduct. All managers are responsible** for supporting and developing systems that maintain that working environment.

### References

The Inter-Agency Standing Committee (IASC) core principles on sexual exploitation and abuse and training and information materials are available on the IASC website:

[http://www.pseatackforce.org/uploads/tools/sixcoreprinciplesrelatingtosea\\_iasc\\_english.doc](http://www.pseatackforce.org/uploads/tools/sixcoreprinciplesrelatingtosea_iasc_english.doc)



MODULE 3

## BUSINESS ETHICS

- ▶ Conflict of interest policy
- ▶ Modern slavery policy
- ▶ Environmental and sustainability policy
- ▶ Photo and video consent policy

## ► CONFLICT OF INTEREST POLICY

### Objective

- No person may profit for other purposes from the organisation's resources either directly or indirectly.
  - Any purchase made by suppliers who are members of the association or their employees.
  - The hiring of family members of members of the association.
  - Contracts for services with a member of the organisation or their family members, companies / societies.
  - Facilities belonging to a member of the association or their families with payments made directly to them.
  - Goods / facilities of the organization used by any member of the association for other purposes.

### Policy implementation

- Possible conflicts of interest will be monitored and reported to the director or the chairperson by all members of the association. If appropriate, complaints and grievances will be referred to the Internal Control Committee for evaluation. The Chairman and the Director may also consult the Internal Control Committee for the cases submitted.
- For the contracts of all staff, volunteers, collaborators, suppliers, a specific and certified check will be carried out, in the margin of the contract, on the negative outcome of the verification of the existence of conflicts of interest.

## ► MODERN SLAVERY POLICY

### Definition of Modern Slavery

- Human trafficking and forced labour with the following characteristics:
  - compulsion to work - by coercion or mental or physical threat;
  - restriction of rights through mental or physical abuse or the threat of abuse;
  - dehumanizing, treated as a

commodity bought and sold as "property";

- physically bound or subject to restrictions on their freedom of movement.

### Application of the policy

- AIFO is committed to ensuring that there are no cases of modern slavery or trafficking in human beings within its global organization or



supply networks. It has a strict zero tolerance approach.

- To increase awareness of modern slavery and how to report it, a special form is incorporated in the

induction course to the association.

- AIFO will evaluate that business practices and procurement are ethical and responsible by suppliers before concluding a contract.

## ► ENVIRONMENTAL AND SUSTAINABILITY POLICY

### Application of the policy

- This policy aims to reinforce the evaluation process during the design phase of an intervention.
- Environmental assessment is a process that takes place throughout the project cycle.
- Environmental impact must be taken into account during the identification, design and implementation, review and evaluation of international development cooperation projects.

- Include representatives of vulnerable people with disabilities, strengthen environmental measures that increase accessibility and break down existing barriers.
- Include representatives of vulnerable people with disabilities in the preparation and implementation of disaster risk reduction plans to limit their impact on the most vulnerable.

### Essential points for AIFO in the environmental assessment

- Gender aspects in environmental assessment. Women living in rural areas are often more vulnerable to environmental degradation due to inequality in access to land.
- The environmental impact of interventions on different social groups and in particular the most vulnerable, disabled and elderly people.



## ► PHOTO AND VIDEO CONSENT POLICY

### Application of the policy

- When possible, establish a relationship before you start taking pictures.
- When approaching photographic / video subjects in the field, introduce yourself briefly, be polite and explain why you want to take pictures.
- In clinical settings, talk to the clinical director before starting to photograph healthcare professionals or patients.

### Picture guidelines in the clinical field

- Respect the photographic subjects, preserve human dignity.
- Avoid using images of identifiable clients in clinics. When photographing a counselling session, position yourself so that you can see the back of the patient's head.
- Avoid showing photos of patients that can have a negative impact on a person or society.
- Use a model in a clinical setting, rather than a real patient, having obtained his agreement.
- To avoid possible misunderstandings on the part of the reader, include a disclaimer for printed or electronic material.





## MODULE 4

# COMPLIANCE WITH OBLIGATIONS (DUE DILIGENCE)

- ▶ Policy for the acquisition of goods and services
- ▶ Programme quality policy
- ▶ Monitoring and evaluation policy
- ▶ Policies for the use of technological structures

# ► POLICY FOR THE ACQUISITION OF GOODS AND SERVICES

## Overview

- The procedures described herein constitute a framework document and must be applied both in Italy and abroad, both within and outside the framework of programmes financed by institutional donors.
- In the event that the guidelines or the donor contract require more restrictive conditions, reference will be made to these particular donor rules.
- For purchases in projects abroad, local legislation on purchasing procedures is also observed.

## General application guidelines

- respect the criterion of equality in the treatment of potential suppliers;
- choose the most economically advantageous offer, i.e. the best quality/price ratio;
- respect the criterion of transparency in the selection and award process;
- ensure that there are no conflicts of interest;
- proportionate the type of procedure to the value of the purchase or supply.

## Exclusion of suppliers

- have been convicted or there is an ongoing investigation for:
  - fraud, corruption, participation in criminal organisations, sexual exploitation and abuse, child exploitation, human trafficking and modern slavery,
- or any other illegal or condemnable activity according to the rules applied by United Nations bodies;
- that have been declared in serious breach of contract or service contracts.
- are in a situation of bankruptcy proceedings, liquidation, composition with creditors or receivership, in accordance with the respective national laws;
- have been convicted of any offence relating to their professional ethics;

## Supplier requirements

- Suppliers shall declare that they are not in any of the above situations, submitting, together with the offer, a self-certification or formal declaration.
- The formal self-certification may be replaced by a contractual clause that guarantees the respect of AIFO ethical standards:

- "The company guarantees to share AIFO's ethical codes, to implement the Policies for the prevention and sanction of sexual exploitation and abuse, not to use and not to encourage the use of child labour, to practice gender equality in labour relations, not to discriminate politically or for reasons of religion, disability, race and ethical origins, nationality, language, social origin".

## Supplier Management

- AIFO may draw up, in Italy as well as in foreign countries, a **List of usual suppliers** for the management and pre-qualification of the suppliers themselves, functional to an effective, correctly optimized and transparent supply chain, which, on the basis of an audit carried out by AIFO's Administrative Services, and authorized by the Management, guarantee the necessary elements of reliability, financial risk and moral correctness.
- *AIFO privileges this procedure that allows a more complete and updated evaluation and verification of the historical relationship with the supplier.*

## Authorizations

### Purchases on site

- foreign cooperation programmes, financed by institutional donors, are authorised by the project manager, whose reference is the ap-

proved expenditure budget, which he must absolutely abide by;

- outside of programmes financed by institutional donors, are authorised by the Country Coordinator in accordance with its spending programme or, where it does not exist, by the EP Service.

### Purchases in Italy

- programmes abroad, are authorised by the Service Manager in agreement with the project manager on site and under the supervision of the Director;
- programmes in Italy, are requested by the competent Service Manager in agreement with the Project Manager in Italy and the Director's authorisation;

## Storage and archiving documents

- All the documentation related to bids and tenders carried out within AIFO programmes must be provided to HQ for safekeeping.
- They document compliance with the procedures and may be monitored by representatives of the donors and the financial and judicial authorities both in the beneficiary countries and in Europe.
- The documentation must be kept for ten years after approval of the final project report.

## ▶ PROGRAMME QUALITY POLICY

### Purpose

- The policy provides the basis for a coherent approach to programme quality management within the organisation. It does this by ensuring that all team members work together on the basis of a shared understanding.
- This principle is useful to standardize and spread the decision-making process at all levels and functions within AIFO and with its partners.

### Approach

- **Inclusive development:** focus on the inclusive development of the community, including people with disabilities and people affected by leprosy or otherwise in vulnerable conditions.
- **Participatory approach:** planning and implementation of the project from the bottom up actively involving multiple stakeholders throughout the decision-making process.
- **Result orientation:** project cycle management, analysis of the logical structure or results-based management approach in project planning.
- **Value for money:** Activities must optimise value for money in everything they do.
- **Responsibility and commitment:** periodically measure the various aspects of the project and

determine whether the actual and reported indicators are in line with those planned.

### Strategic Requirements

- Projects in line with AIFO's vision, mission and strategic plans.
- All project activities are aligned with policies, particularly with regard to child protection policy, prevention of sexual exploitation and abuse and sustainability.
- All AIFO partners' projects develop the implementation of strategic plans in line with this programme quality policy.

### Operational Requirements

- All projects are designed, implemented and reviewed following the project cycle management, the logical framework of the programme, the theory of change, and results-based management tools.
  - All stakeholders play a substantial role in making all major decisions.
  - The staff responsible for project management and support understands the priorities and requirements of the donors that finance AIFO.
  - All staff are actively encouraged to commit to the quality of the programme and its implementation and are recruited, supported and managed accordingly.
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# ► MONITORING AND EVALUATION POLICY

## Monitoring and evaluation objectives

- Ensure the achievement of the objectives, expected results and project activities;
- Learn useful lessons from the implementation of projects and programmes, and use this teaching to improve or refine programme management on an ongoing basis.

## Definitions

- Monitoring: an ongoing assessment that aims to provide all stakeholders with timely and detailed information on the progress or delay of ongoing monitored activities.
- Evaluation: a systematic and objective examination of the relevance, effectiveness, efficiency and impact of activities in the light of specific result indicators.

## Monitoring

- All AIFO projects adopt the constant monitoring and reporting with respect to the agreed action plan and combined with the project input, process, output and results indicators.
- Monitoring also makes it possible to prepare the material that will serve as a basis for the evaluation

of the project:

- Case studies, quantitative and qualitative data, narrative reports, periodic financial and administrative reports are fundamental tools for constant monitoring and periodic evaluations.

## Evaluation

- AIFO projects include internal interim and final evaluations and an external final evaluation, subject to the availability of funds.
- They will follow the quantitative, qualitative and emancipatory approach for the interim and final evaluation.
- The final evaluation report shows the Association and the donor how the results have been achieved with respect to the proposal. It indicates good practices, reliability, remaining challenges and strategies to overcome them.

## Three universal questions for evaluation

- **The first:** “Are we doing what we said we would do? ”, it is necessary to receive an answer for the day-to-day intervention managers to show that they are completing the agreed work (internal validity).

- **The second:** “are we making a difference?” needs to be answered by all stakeholders, but it is particularly relevant for donors to ensure that the money has been spent effectively (impact assessment).
- Finally, **the third** question: “**are these the right things to do?**” provides the necessary information to project leaders to ensure that the association remains relevant and is doing the right thing strategically (strategic relevance and learning).

## ► POLICIES FOR THE USE OF TECHNOLOGICAL STRUCTURES AND PRIVACY

### Purpose of the IT Policy

- It is the policy of the Board of Directors to ensure that access and use of IT resources is a privileged tool with the aim of facilitating the success of AIFO’s activities.
- The acceptable use of AIFO IT resources includes any purpose related to the direct and indirect support of the activities and to the full achievement of AIFO’s mission objectives.
- AIFO IT resources include all electronic equipment, facilities, technologies and data used for information processing, transfer, storage, display, printing and communications.
- They also include services owned, rented, managed, provided or otherwise connected to AIFO resources, such as cloud computing or any other service connected / hosted and provided.

### Incorrect use of IT resources

- Authorized users must engage in a misuse of AIFO system IT resources, which includes but is not limited to the following:
  - Sharing or unauthorized transfer of credentials, data, passwords that could allow unauthorized users to access AIFO system IT resources, except for what required by the administration;
  - Violation of national laws; association policies, rules or guidelines; or licensing agreements or contracts;
  - External employment, commercial activities or other forms of private financial gain;
  - Campaign for public offices or soliciting political contributions;
  - Political lobbying;
  - Betting;
  - Use for private or personal purposes that interferes with work.

## Safeguard and privacy

- AIFO is not responsible for the content of documents, exchanges or messages, including links to other information on the Internet that reflect only the personal ideas, comments and opinions of individual members of the community, even when this content is published or otherwise distributed to the public.
- The contents of users' accounts will be treated as private and not examined, except that:
  - if required for system maintenance or business needs, including security measures;
  - if there is reason to believe that an authorised person is in breach of the law or the policy of the Association, upon notification by the relevant authority, the Board of Directors, the Internal Control Committee;

## Authorizations

- For confidentiality and respect of data security and privacy the Rules of access and use of AIFO computer network, connected archives, internet services is decided by the Director, depending on the performance of the work.
- Consequently, access to the network and to the computer archives must always, exclusively and exclusively take place through the methods established by the Network Administrator.

- The organizational communication manager is the Director who has the duty to protect AIFO's image and at the same time to guarantee the efficiency and usefulness of the network.

## Communications to the outside world

- AIFO's activity is based on an annual communication plan that has as interlocutors a communication expert Agency and journalists in charge of the management of the various media, from magazines to web tools.
- The President of AIFO is the head of the magazine-house organ of AIFO-, and the Director is the figure who reports to the Board of Directors for the various communication and information projects that are reported annually in the Social Report.
- AIFO works for a responsible, understandable and shared communication, a tool to consolidate and strengthen its mission and positioning in the company, but also its credibility towards partners and donors.

## Internal communications

- The mailbox assigned to the user is a working tool for AIFO.
- The user is responsible for the correct use and must take strict care that the contents and recipients of

outgoing messages are inherent to their skills, always asking the hierarchical superior for permission to send sensitive or confidential documentation.

- It is forbidden to forward messages outside the Association that are not related to the user's skills and not related to his/her work or association activity.

## Data protection and back-up

- AIFO Sede has a centralized and regular downloading system of data on its activities and projects.

- The foreign coordination offices in the countries have a system of local downloading and regular updating of data with the sending to the Head Office.
- Both Head Office and local offices also use Office 365 to share documents in Cloud mode.
- In these activities the privacy, confidentiality and security of data and documentation must always be respected, immediately reporting any anomalies found by the Senior Manager.





## MODULE 5

# RESPONSIBILITY AND TRANSPARENCY

- ▶ Financial and administrative policy
- ▶ Policy on internal and external audits

## ► FINANCIAL AND ADMINISTRATIVE POLICY

### Responsibility

- The responsibilities for implementing the management, administrative and accounting policy were defined by the Board of Directors on 12 September 2009.
- The Board of Directors, on the proposal of the Management, by its own resolution defines the powers to sign acts that commit the Association, to be attributed to those responsible for the orderly performance of the tasks assigned to them, also defining their modalities and limits.

### Services and functions

- The Management avails itself of a "Management Secretariat" and four Services:
  - Secretariat and General Services, Information Systems
  - Administration and General Accounting, Management Control and Reporting,
  - Educational and Training Activities, Civil Service, Communication and Fundraising,
  - Foreign projects, national and international scientific activity.
- The Association complies with the regulations in force for noncommercial entities for the keeping of company books, the administration of assets and accounting, and the preparation of the financial statements.





## ► POLICY ON INTERNAL AND EXTERNAL AUDITS

### Association audits

- According to the provisions of art. 10 of the Statute of “Control Body and Statutory Auditor”, AIFO’s National Assembly elects the Board of Statutory Auditors.
- The Board of Auditors usually meets quarterly to check compliance with the Articles of Association and the principles of correct administration.
- AIFO avails itself annually of an independent auditing firm for the certification of the financial statements and compliance control. The audit is carried out in compliance with international auditing standards (ISA Italy).

### Project audits

- The Funding Authority may request that an annual audit be carried out or at the end of the project by an external auditor.
- Contracts/conventions stipulated with the donor provide that the entity may at any time (usually 5 years) carry out an audit of operations and/or administrative aspects related to the funded project.
- In case AIFO is “applicant” of the project, it will be required to check and keep also the documents of the other partners.







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