



**EngenderHealth**  
for a better life

# **Duty of Care Policy**

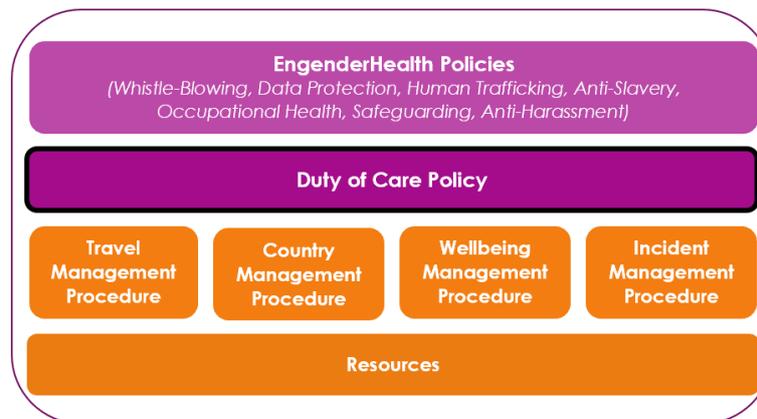
## **January 2019**

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## Duty of Care Framework

This document is part of EngenderHealth's Duty of Care Framework that consists of this policy, procedures and resources, as illustrated below.



## Policy Introduction

All environments around the world hold an inherent threat. Wherever we are as individuals, we will be at some level of risk. Political, socio-economic and other factors, combined with EngenderHealth's mission and activities, contribute to shifting dynamics that may present violence, insecurity and disorder. These dynamics may directly impact the physical and mental health of EngenderHealth's staff and associates. This policy and the Duty of Care Framework has been designed to minimise the impact to EngenderHealth's staff and associates, and the organization's reputation, finances and sustainability.

### Accountability Statement

As such, EngenderHealth takes the security and wellbeing of all staff and associates very seriously and fully accepts the duty to provide a reasonable standard of care to those performing activities on EngenderHealth's behalf that could bring them to harm.

## Policy Approach

This policy details how we achieve our duty of care obligations and applies to all EngenderHealth's staff and associates, regardless of their location. Any deliberate breach of this policy and the Duty of Care Framework is considered a disciplinary matter and may result in disciplinary action, including termination of any contract, in a manner that follows EngenderHealth's Human Resources and disciplinary procedures.

### Risk Appetite

To achieve EngenderHealth's mission and to remain sustainable and relevant, the organization accepts the need to operate in locations that inherently involve exposure to safety, security and wellbeing risks. To reduce the likelihood of injury, trauma or death, EngenderHealth seeks to actively manage all safety, security and staff wellbeing risks to reasonable levels. This requires the equal engagement of all EngenderHealth's staff and associates. In exceptional circumstances, EngenderHealth may engage in activities above our normal risk appetite (of

moderate residual risk). Where this is the case, EngenderHealth will assess the risk against our strategic objectives, and the social impact that can be achieved by working with these risks.

### *Framework Principles*

This policy and EngenderHealth's entire Duty of Care Framework is guided by the following principles:



#### **Primacy of Life and Wellness**

The safety, security and wellbeing of EngenderHealth's staff and associates is our highest priority and takes precedence over anything else, including EngenderHealth's operations, property and reputation.



#### **Increased Exposure**

EngenderHealth understands that there are factors (e.g. LGBTQI status, gender, ethnicity, etc.,) that can expose EngenderHealth's staff and associates to increased risk. In response, EngenderHealth commits to supporting each individual at increased risk by assessing the risk and developing targeted risk reduction measures.



#### **Informed Consent**

EngenderHealth actively shares information about the risks that our staff and associates may face, so that they can make an informed decision to either consent to these, or freely decline them. No staff or associate will ever be forced or coerced into accepting more risk than they are personally comfortable with.



#### **Safeguarding**

EngenderHealth is committed to all children, young persons, adults, and vulnerable adults having the right to safeguarding irrespective of ability, ethnicity, faith, gender, sexuality, and culture. This is reflected in our programming and our assessment of risk.



#### **Shared Responsibility**

For our Duty of Care policies and practices to be effective in reducing the risks to our staff and associates, we must all share the responsibility for their implementation and improvement. As such, a failure at one level of the organization, constitutes a failure at all levels of the organization.



#### **Proportionality**

EngenderHealth ensures that the measures put in place to reduce security and wellbeing risks are commensurate to the threat and risk. Therefore, EngenderHealth will not place overly restrictive measures on staff and associates in low risk environments. Conversely, staff and associates working in heightened risk environments will be subject to more rigorous and robust measures.



## Adequate resourcing

EngenderHealth seeks to ensure that the resources required to implement and improve security risk management and staff wellbeing are adequate, in terms of human and financial capacity. This requires the inclusion of such resources in all donor proposals, at all levels of the organization.



## Effective Communication

EngenderHealth effectively communicates with all staff and associates in simple and accessible language to create a positive and accessible security risk management and staff wellbeing culture. This includes providing access to information and to those with security risk management and staff wellbeing responsibilities.



## Continuous Improvement

EngenderHealth provides assessment, reflection and feedback mechanisms to inform EngenderHealth's staff and associates of any improvements we can make to our security risk management and staff wellbeing policies and practices.

# Policy Implementation

## Governance

The Chief Executive Officer (CEO), together with the Board of Directors, has ultimate responsibility for this policy and the Duty of Care Framework and its proper management, using a systematic approach, which is based on risk levels and minimum-security standards. As such, the CEO will receive a summary of any reported safety and security incidents or attempts at each Executive Team meeting.

## Responsibilities

EngenderHealth has four levels of security risk and staff wellbeing management responsibility (Risk Owners, Risk Managers, Risk Advisors, Risk Exposed). The responsibilities for each level are shown below:



## Risk Owners

### Chief Executive Officer:

- Hold ultimate accountability for the safety, security and wellbeing of all staff and associates.
- Through the Chief of Finance and Administration, ensure that the Duty of Care Framework governs and regulates security and staff wellbeing risk, and is periodically reviewed against legal standards and sector best-practice.
- Ensure adequate financial and human resources to support the management of security and staff wellbeing risk, including allocating contingency funding for unforeseen emergency situations.

- Provide executive oversight and decision-making authority for security risks that are deemed to be exceeding EngenderHealth's risk appetite.
- Approve all travel to all **EXTREME** risk rated destinations, exploring any further options for minimising risks, or decline the travel.
- Approve all in-country activities with an **EXTREME** residual risk rating, exploring any further options for minimising risks, or decline the activities.

#### **Chief of Finance and Administration:**

- Ensure that the Duty of Care Framework governs and regulates security and staff wellbeing risk and is reviewed against legal standards and sector best-practice, every two years as a minimum.
- Ensure adequate financial and human resources to support the management of security and staff wellbeing risk, including allocating contingency funding for unforeseen emergency situations.
- Retain operational authority for cancelling, postponing or suspending any activities or travel where the risks have escalated beyond EngenderHealth's risk appetite.
- Inform all staff and associates under their management of the requirements to adhere to the Duty of Care Framework.
- Approve all travel to all **HIGH** risk rated destinations, exploring any further options for minimising risks, and escalate travel to all **EXTREME** rated risk destinations to the CEO.
- Approve all activities with a **HIGH** residual risk rating, exploring any further options for minimising risks, and escalate all in-country activities with an **EXTREME** residual risk rating to the CEO.
- Ensure that HQ staff and associates receive up to date risk information prior to their departure to the field.
- Provide mechanisms that allow for incidents to be reported to EngenderHealth at any time, ensuring the correct capacity and capability to manage incidents that pose a direct threat to life or have serious implications for EngenderHealth's staff, associates, finances, reputation, legal position, or sustainability.
- Authorise the withdrawal or evacuation of any staff or associates in the event of an emergency or deterioration in the contextual environment.
- Ensure that the country programme procedures are completed at the correct regularity, reviewing them for accuracy and comprehensiveness, following the review by the Regional Representative.
- Coordinate a reflective review of any incidents reported by any staff member of associate, ensuring that they are accurately entered into the Global Incident Database.
- Review this policy and the entire Duty of Care Framework every two years, as a minimum, in collaboration with any key internal stakeholders or external third-party providers.



#### **Risk Managers**

#### **Regional Representatives**

- Report any deliberate violations of the Duty of Care Framework to the Chief of Finance and Administration either verbally or by email.

- Ensure adequate financial and human resources (in the region) to support the management of security and staff wellbeing risk, including allocating contingency funding for unforeseen emergency situations.
- Inform all staff and associates under their management of the requirements to adhere to the Duty of Care Framework.
- Ensure that the country programme procedures (within the region) are completed at the correct regularity, reviewing them for accuracy and comprehensiveness, before submitting for approval to the Chief of Finance and Administration.
- Ensure that any international travel has been determined as a necessity.
- Approve all travel to all **NEGLIGABLE**, **LOW** and **MODERATE** risk rated destinations (in the region), exploring any further options for minimising risks, and escalate travel to all **HIGH** and **EXTREME** risk rated destinations to the Chief of Finance and Administration.
- Approve all activities (within the region) with a **NEGLIGABLE**, **LOW** and **MODERATE** residual risk rating, exploring any further options for minimising risks, and escalate all activities with a **HIGH** and **EXTREME** residual risk rating to the Chief of Finance and Administration.
- Provide an opportunity for any staff member and associate under their management to give explicit and informed consent to the risks they may face, or to freely decline where they feel the risks exceed their own personal risk appetite.
- Ensure that adequate travel, personal accident and other relevant insurance is in place (for the region, including any physical offices).
- Coordinate a reflective review of any incidents reported (within the region) by any staff or associate.

### Country Representatives

- Report any deliberate violations of the Duty of Care Framework to the Chief of Finance and Administration.
- Ensure adequate financial and human resources (in the country) to support the management of security and staff wellbeing risk, including allocating contingency funding for unforeseen emergency situations.
- Inform all staff and associates under their management of the requirements to adhere to the Duty of Care Framework.
- Ensure that the country programme procedure is completed at the correct regularity and submitted to the Regional Representative.
- Develop national travel and activity risk assessments.
- Ensure that any national travel has been determined as a necessity.
- Approve all travel to all **NEGLIGABLE**, **LOW** and **MODERATE** risk rated destinations (in the country), exploring any further options for minimising risks, and escalate travel to all **HIGH** and **EXTREME** risk destinations to the Regional Representative.
- Approve all activities (within the country) with a **NEGLIGABLE**, **LOW** and **MODERATE** residual risk rating, exploring any further options for minimising risks, and escalate all activities with a **HIGH** and **EXTREME** residual risk rating to the Regional Representative.
- Provide mechanisms that allow for incidents to be reported to EngenderHealth at any time, ensuring the correct capacity and capability to manage incidents that pose a direct threat to life or have serious implications for EngenderHealth's finances, reputation, legal position or sustainability.

- Provide an opportunity for any staff and associate under their management to give explicit and informed consent to the risks they may face, or to freely decline where they feel the risks exceed their own personal risk appetite.
- Ensure that adequate travel, personal accident, and other relevant insurance is in place (for the country).
- Ensure that all safety and security incidents are reported in writing to the Regional Representative and Chief of Finance and Administration within three days of the incident taking place.
- Coordinate a reflective review of any incidents reported (within the country) by any staff member or associate.

### **HQ Line Managers (of HQ staff who travel internationally)**

- Report any deliberate violations of the Duty of Care Framework to the Chief of Finance and Administration.
- Inform all staff and associates under their management of the requirements to adhere to the Duty of Care Framework.
- Ensure that any international travel has been determined as a necessity.
- Develop international travel and activity risk assessments.
- Approve all travel to all **NEGLIGABLE**, **LOW** and **MODERATE** risk rated destinations, exploring any further options for minimising risks, and escalate travel to all **HIGH** and **EXTREME** risk rated destinations to the Chief of Finance and Administration.
- Provide an opportunity for any staff and associate under their management to give explicit and informed consent to the risks they may face, or to freely decline where they feel the risks exceed their own personal risk appetite.



### **Risk Advisors**

#### **Security Focal Points (SFPs)**

- Maintain and monitor the effectiveness of the Duty of Care Framework (Global SFPs) and the Country Program Procedure (Regional and National SFPs).
- Conduct in-country check-ins with staff and associates at pre-agreed times.
- Provide technical guidance, support and advice to colleagues (including briefings) on any safety and security related risks that may be encountered.
- Escalate any issues or concerns surrounding the safety and security of any staff or associate to their line manager.
- Coordinate with all external third-party providers (e.g. travel insurance providers, travel management companies, risk management consultancy companies) to ensure that adequate technical expertise and support are well integrated into the Duty of Care Framework/Country Program Procedure(s).
- Advise on any requirements for staff and associates to complete safety and security training, and periodically assesses the appropriateness and relevance of this training.

#### **Wellbeing Focal Points (WFPs)<sup>1</sup>**

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<sup>1</sup> This role is adopted by the nominated Safeguarding Focal Points in each country.

- Maintain and monitor the effectiveness of the Duty of Care Framework (Global WFPs) and the Country Program Procedure (Regional and National WFPs).
- Provide technical guidance, support and advice to colleagues on any wellbeing related risks that may be encountered.
- Provide information and guidance on managing wellbeing.
- Escalate any issues or concerns surrounding the wellbeing of any staff member or associate to their line manager.
- Coordinate with all external third-party providers (e.g. Psychosocial providers) to ensure that adequate technical expertise and support are well integrated into the Duty of Care Framework / Country Program Procedure(s)
- Advise on any requirements for staff and associates to complete staff wellbeing training, and periodically assesses the appropriateness and relevance of this training.
- Provide Psychological First Aid in the event of a critical incident and refer onto specialised psychological and medical care as required.



### **Risk Exposed** (All staff and associates)

#### **Responsibilities:**

- Fully comply with the Duty of Care Framework, following security instructions to avoid unnecessary risks and prevent behaviour which brings themselves or others into danger.
- Participate in and contribute to organizational safety, security and wellbeing measures be conscious of security conditions.
- Notify their line manager (or EngenderHealth's contact) of any intention to travel, at the earliest possible opportunity.
- Request further information from EngenderHealth's security and wellbeing focal points concerning any safety, security or wellbeing risks, if they feel that they are not fully informed.
- Methodically and accurately complete (or in the case of associates, review) a Risk Assessment for all travel to locations with a **HIGH** or **EXTREME** risk rating, in consultation and collaboration with others.
- Complete required safety, security and wellbeing training.
- Ensure that EngenderHealth has up to date Next of Kin contacts.
- Be reliably contactable at all times and inform their line manager (or in the case of associates, EngenderHealth contact) of their location and other reasonably requested information, at the agreed times.
- Immediately report any incidents to EngenderHealth that have caused, or the potential to cause, injury, harm, or mental or physical illness to themselves or others, including any potential safeguarding issues.
- Observe any national laws that apply in each location at all times and show respect for local customs and cultural practises.
- Behave in a manner that does not compromise the safety, security or wellbeing of themselves or others.
- Act with integrity, accountability, professionalism and consistency with EngenderHealth's vision, mission and values.

- Avoid sensitive discussions of politics and religion and demonstrate an understanding that EngenderHealth is a non-political, non-religious organization
- Work in a spirit of equity and mutual respect.
- Be responsible with the use of information, equipment, money and resources to which they have access.
- Take action to refrain from and report any form of corruption or bribery.

## Duty Bearers and Obligations

EngenderHealth has a different duty of care obligation to different categories of duty bearer. As such, this will be reflected in the application of EngenderHealth's procedures and practices. To meet these obligations, EngenderHealth commits to providing the following, to each duty bearer:



EngenderHealth commits to:

- Inform staff members of the threats and measures to prevent and mitigate risk.
- Provide staff with a verbal pre-departure briefing when travelling to locations with a **HIGH** or **EXTREME** risk rating.
- Inform staff of their security and wellbeing responsibilities and obligations.
- Manage the safety, security and wellbeing of all staff in their contracted location, during normal working hours.
- Manage the safety, security and wellbeing of staff when travelling outside their contracted location for EngenderHealth, during and outside of normal working hours.
- Provide robust risk reduction measures.
- Provide appropriate and comprehensive insurance, including personal accident (medical), travel and life insurance.
- Ensure access to physical medical support and information before, during and after employment and deployment, including post incident.
- Ensure access to appropriate psychosocial support and information before, during and after employment and deployment, including post-incident.
- Ensure access to risk level appropriate safety, security and wellbeing training
- Ensure that staff members can freely decline security risk, when they feel that the work poses an unreasonable level of risk, by asking to not travel to a location or to be withdrawn from a location, in which they are not normally resident<sup>2</sup>.



EngenderHealth commits to:

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<sup>2</sup> However, if the risks are constant, or withdrawal is likely to be frequent or long-term, EngenderHealth will undertake a review between the staff member and his/her line manager to determine an appropriate course of action, which could include an assessment as to whether employment in that position should continue, in line with organisational procedures.

- Conduct a rapid assessment, as part of the procurement process, of the safety and security management capabilities of associates; and where capacity is low, require the associate to secure appropriate guidance and support.
- Inform associates of the threats and measures to prevent and mitigate risk.
- Provide associates with a verbal pre-departure briefing when travelling to locations with a **HIGH** or **EXTREME** risk rating.
- Inform associates of their security responsibilities and obligations.
- Manage the safety and security of associates in their contracted location, during normal working hours.
- Manage the safety and security of associates when travelling to locations for EngenderHealth, with a **HIGH** or **EXTREME** risk rating, during and outside of normal working hours.
- Provide robust risk reduction measures.
- Inform (on request) associates of relevant personal accident and travel insurance cover.
- Inform (upon request), associates of recommended risk level appropriate safety, security and wellbeing training, including considering the option to provide training, where this is not normally available, on a case by case basis.
- Ensure that associates can freely decline security risk, when they feel that the work poses an unreasonable level of risk, by asking to not travel to a location or to be withdrawn from a location, in which they are not normally resident<sup>3</sup>.

### → **Sub-Awardees**

EngenderHealth commits to:

- Conduct a rapid due diligence review of safety, security and wellbeing policies, protocols and practices of potential sub-awardees prior to contractual agreement.
- Ensure that contracts with sub-awardees clearly explain the necessity for appropriate safety, security and wellbeing policies and practices.

### **Donors**

EngenderHealth commits to:

- Understand donor duty of care requirements.
- Implement the necessary policies and practices to achieve these requirements.

## *Security Management Strategies*

As EngenderHealth's operating locations hold different risks that originate from multiple and different threats, EngenderHealth will assess and deploy different security strategies in each location, prior to travel or activity implementation. This ensures that the deployed strategies are most appropriate in reducing the risk to EngenderHealth's staff and associates. EngenderHealth recognises that different security strategies can,

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<sup>3</sup> However, this will likely terminate all, or parts of the associate agreement in place, in line with organisational procedures.

and should, be deployed at different times and with different weightings. As such EngenderHealth works with a menu of security strategies, as follows:

 <b>Acceptance</b>	Reducing risk by having acceptance for EngenderHealth / EngenderHealth's partners' work ( <i>preferred option</i> )
 <b>Low Profile</b>	Reducing risk by remaining under the radar
 <b>Physical Protection</b>	Reducing risk through physical protection measures
 <b>Non-Armed Deterrence</b>	Reducing the risk or responding to an incident by containing the threat with a non-armed counter-threat (e.g. CCTV)
 <b>Armed Deterrence</b>	Reducing the risk or responding to an incident by containing the threat with an armed counter-threat ( <i>last resort option</i> )

### Risk Rating and Minimum-Standards

To help us understand and manage the level of risk that EngenderHealth's staff and associates may be exposed to, we use minimum standards. Many of these minimum standards are related to the risk rating that we use (provided by EngenderHealth's insurers) which are shown below:

<b>NEGLIGABLE</b>	<b>LOW</b>	<b>MODERATE</b>	<b>HIGH</b>	<b>EXTREME</b>
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### Training Standards

To achieve our Duty of Care obligations, EngenderHealth commits to maintaining adequate security and wellbeing training using risk-based and role-based standards, as follows:

#### Risk-based standard

The table below explains the mandatory security training requirement for all staff located in, or travelling to any location, by risk rating:

<b>NEGLIGABLE</b>	<b>LOW</b>	<b>MODERATE</b>	<b>HIGH</b>	<b>EXTREME</b>
Personal Security	Personal Security	Personal Security	Hostile Environment Awareness	Hostile Environment Awareness

## Role-based standard

The table below explains the mandatory security training requirement for all staff, by role:

Role	Training
All staff	On-boarding Security Briefing
	Wellbeing & Resilience for Frontline Workers <sup>4</sup>
Executive Team, Regional and Country Representatives	Security Risk Management Wellbeing & Resilience for Managers <sup>5</sup> , Psychological First Aid
Security Focal Points	Security Risk Management
Wellbeing Focal Points <sup>6</sup>	Psychological First Aid Wellbeing & Resilience for Managers
Safeguarding Focal Points	Safeguarding
Incident Management Teams	Incident / Crisis Management
Family Liaison Officers	Family Liaison
Guards	Guarding (delivered in country)
Drivers	Defensive Driving (delivered in country) Technical Training

## Duty of Care Management Procedures

EngenderHealth's staff and associates are exposed to safety, security and wellbeing threats and risks when travelling, when working in country and during and after incidents. In recognition of this, and in order to achieve EngenderHealth's Duty of Care obligations, we created specific travel, country, wellbeing and incident management procedures, as part of the Duty of Care Framework.

## Incident Management

Through the incident management procedure, EngenderHealth ensures an appropriate mechanism for the effective management of any incident and crisis. The following section details EngenderHealth's policy approach to security and medical evacuation, and abduction situations:

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<sup>4</sup> Free online training available at <https://kayaconnect.org/course/info.php?id=746>. Staff will need to send the certificate of completion to the Governance and Operations Department.

<sup>5</sup> Free online training available at <https://kayaconnect.org/course/info.php?id=746>

<sup>6</sup> This role is adopted by the nominated Safeguarding Focal Points in each country.



## Security Evacuation

- All staff travelling outside of their contracted country location are entitled to a security evacuation.
- The security evacuation of staff members in their contracted country location will only be considered in cases where their work has placed them in individual danger and is at the discretion of the Chief of Finance and Administration.
- The decision to security evacuate:
  - Can be made by the traveller themselves, the Country Representative, the Regional Representative or the Chief of Finance and Administration.
  - Cannot be overruled by anyone, unless a more senior line manager determines that the security evacuation would expose staff to greater immediate danger than remaining in the current location.
  - Is binding for all staff entitled to evacuation. If a staff member refuses to evacuate, they do so on the understanding that their employment contract is immediately terminated and EngenderHealth no longer has a duty of care to them.
- Where a security evacuation is deemed necessary but there is no possibility of evacuating everyone, staff who are deemed to be at the highest risk will be given priority, at the discretion of the CEO.
- Staff may only return to a location after a security evacuation following a full security risk assessment and updated country management procedure, and with the approval of the CEO.



## Medical Evacuation

- All staff travelling outside of their contracted country location are entitled to a medical evacuation (unless they fail to declare a pre-existing medical condition that indicates that they should not travel).
- The medical evacuation of staff members in their contracted country location will only be considered in cases where appropriate medical care is not available in country and is at the discretion of the Chief of Finance and Administration.
- The decision to medical evacuate:
  - Can be made by EngenderHealth's insurers, or if not an insured evacuation, by an appropriately qualified medical doctor, who is not employed by EngenderHealth.
  - Cannot be overruled by anyone, unless a member of the Executive Team determines that the medical evacuation would expose the staff to immediate security related dangers, placing their lives at more urgent risk.
- Staff may only return to a location after a medical evacuation, following travel clearance issued by EngenderHealth's insurers, or a nominated medical doctor.

## Abduction

- EngenderHealth's Crisis Management Team provides advice and expertise in the handling cases of abduction which may be supplemented by crisis management specialists.
- The Crisis Management Team will be guided by the primary objective of ensuring the safety of the individual abductees, and the secondary objective of securing their safe release.
- EngenderHealth promotes preventive measures in areas with an elevated abduction threat.
- EngenderHealth will not pay ransoms or concede to other demands from groups or individuals in order to obtain the release of abducted staff members.
- EngenderHealth will not facilitate ransoms payments on behalf of others, including the family members of staff.

## Definitions

- **EngenderHealth Staff:** All individuals who receive a regular salary for work at any location where EngenderHealth operates (locally or internationally).
- **EngenderHealth Associates:** All paid and non-paid individuals who have committed to work with or support EngenderHealth. It includes volunteers, interns, and associates and contractors

## Policy Review

To meet with sector best practice, security risk and wellbeing management developments and any changes in applicable law, EngenderHealth agrees to review this policy and the entire Duty of Care Framework every two years, as a minimum. It is the responsibility of the Chief of Finance and Administration to complete this review, in collaboration with any key internal stakeholders or external third-party providers.